

Good
Practice
Note

Environmental & Social
Framework for IPF
Operations

**Addressing Sexual
Exploitation and Abuse and
Sexual Harassment
(SEA/SH) in
Human Development
Operations**

First Edition



Good Practice Notes (GPNs) are produced to help World Bank staff in providing implementation support to Borrowers in meeting the requirements of the Environmental and Social Framework (ESF). They are written in a style and format that is intended for all staff and development partners to use. GPNs are advisory in nature and are not World Bank policy nor are they mandatory. They will be updated periodically to reflect emerging good practice.

First Edition

Published September 2022

This Good Practice Note (GPN) was prepared by a team from the Human Development (HD) Practice Group and the Gender Group, supported by Operations Policy and Country Services (OPCS) and the Environment and International Law Unit (LEGEN). The GPN team was led by Maninder Gill (Chief Environmental and Social Standards Officer) and Alberto Rodriguez (Director for Strategy and Operations, Human Development Practice Group) and comprised of Salina Giri, Maree Newson, Colin Scott, Niyati Shah, Diana Arango, and Ian White, with contributions from Victor Mosoti, David Warren, Robin Mearns, Rob Chase, Meskerem Mulatu, Daniela Greco, Michael Mahrt, Laura McDonald, Quentin Wooden, Aline Coudouel, Sameera Al Tuwajiri, Alessandra Heinemann, Ioana Botea, Stephanie Kuttner, Penny Williams, Trishna Rajyalaxmi Rana, Jon Lindsay, Siobhan McInerney-Lankford, Duygu Cicek, Caroline van Kampen, and Baria Daye.

The team gratefully acknowledges the support and leadership provided by OPCS Vice President, Ed Mountfield, and HD Vice President, Mamta Murthi, as well as HD Global Practice Directors – Jaime Saavedra, Michal Rutkowski, Juan Pablo Uribe, Hana Brix, and HD Practice Managers – Omar Arias, Feng Zhao, Loli Arribas-Banos, Andrea Kucey.

This GPN builds on the guidance set out in the “ESF Good Practice Note on Addressing Gender Based Violence in Investment Project Financing involving Major Civil Works,” first published in September 2018.

Abbreviations

ADM	Accountability and Decision-making Framework
BIA	Best interests assessment
BID	Best interests determination
CoC	Code of Conduct
DHS	Demographic and Health Surveys
E&S	Environmental and Social
ESA	Environmental and Social Assessment
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESIRT	Environment and Social Incident Response Toolkit
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESRC	Environmental and Social Risk Classification
ESRS	Environmental and Social Review Summary
ESS	Environmental and Social Standard
FCV	Fragility, Conflict and Violence
FGM	Female genital mutilation
GBV	Gender-based Violence
GPN	Good Practice Note
GM	Grievance Mechanism
HIV/AIDS	Human Immunodeficiency Virus/Acquired Immune Deficiency Syndrome
HD	Human Development (Education; Social Protection and Jobs; Health, Nutrition and Population)
HNP	Health, Nutrition and Population
IASC	Inter-Agency Standing Committee (UN)
IPF	Investment Project Financing
IPV	Intimate partner violence
ISR	Implementation Status and Results Report
LGBTI+	LGBTI + Lesbian, gay, bisexual, transgender and intersex people and + is a denotation of everything on the gender and sexuality spectrum.
M&E	Monitoring and Evaluation
NGO	Nongovernmental Organization
OHS	Occupational health and safety
PAD	Project Appraisal Document
PCN	Project Concept Note
PIU	Project Implementation Unit
RSA	Regional Environmental and Social Standards Advisor
SEA	Sexual Exploitation and Abuse
SH	Sexual Harassment
SEP	Stakeholder Engagement Plan
SPJ	Social Protection and Jobs

SSI	Social Sustainability and Inclusion
TBD	To be determined
TOR	Terms of Reference
UN	United Nations
UNFPA	United Nations Population Fund
UNICEF	United Nations International Children’s Fund
WHO	World Health Organization

Glossary

Accountability and Response Framework	The framework details how allegations of SEA/SH are handled (administrative investigation procedures) and how disciplinary actions for violation of the required behaviors by workers are determined, including as set out in any Code of Conduct or Behavioral Standards.
Behavioral Standards	In this GPN, Behavioral Standards refers to a set of written principles and minimum standards of behavior with which project actors are required to comply as a condition of their employment or membership of an organization, institution, or professional body. Behavioral Standards may be grounded in legislation, regulations, or rules of the jurisdiction or in existing employment contracts. Violation of Behavioral Standards may result in disciplinary action and may affect the project actor’s ongoing employment or professional membership, license, or accreditation.
Child	Article 1 of the United Nations (UN) “Convention on the Rights of the Child” defines children as those under the age of 18. The UN Secretary General’s Bulletin on Special Measures for protection from sexual exploitation and abuse, October 9, 2003, ST/SGB/2003/13, also defines children as anyone under the age of 18 and explicitly prohibits sexual activity with a child regardless of the age of majority or age of consent locally (paragraph 3.2 (b)).
Child marriage	Child marriage refers to any formal marriage or informal union between a child under the age of 18 and an adult or another child (UNICEF).
Code of Conduct	In this GPN, a Code of Conduct (CoC) refers to a written document that sets out core principles and minimum standards of behavior with which project actors agree to comply on an individual basis, specifically in relation to a Bank-financed project. A CoC will usually be rolled out to individuals who are not covered by existing Behavioral Standards and who are engaged specifically for the project. Violation of the CoC may result in disciplinary action by an employer and may affect the worker’s ongoing employment.
Consent	SEA/SH arises when consent is not voluntarily and freely given, or where a person is considered unable to consent due to age or capacity. Consent must be informed, based on a clear appreciation and understanding of the facts, implications, and future consequences of an action. In order to give consent, the individual concerned must have all relevant facts at the time consent is given and be able to evaluate and understand the consequences of an action. The individual also must be aware of and have the power to exercise the right to refuse to engage in an action and/or to not be coerced (i.e., by financial considerations, force, or threats). There are instances where consent might not be possible due to cognitive impairments and/or physical, sensory, or developmental disabilities.

Gender-based violence (GBV)	Gender-based violence (GBV) is an umbrella term for any harmful act that is perpetrated against a person’s will and that is based on socially-ascribed (i.e., gender) differences between males and females. It includes acts that inflict physical, sexual, or mental harm or suffering; threats of such acts; coercion; and other deprivations of liberty. These acts can occur in public or in private (2015 Inter-Agency Standing Committee Gender-based Violence Guidelines, pg. 5).
Gender-based violence (GBV) service provider	An organization offering specific services for GBV survivors, including survivors of SEA/SH, such as health services, psychosocial support, shelter, legal aid, safety/security services, etc.
HD Operations	World Bank IPF projects that include activities related to Health, Nutrition, Population, Education, Social Protection, and Jobs.
Human trafficking	Trafficking in persons is defined as the recruitment, transportation, transfer, harboring, or receipt of persons by means of the threat or use of force or other forms of coercion, abduction, fraud, deception, abuse of power, or of a position of vulnerability, or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purposes of exploitation. Women and children are particularly vulnerable to trafficking practices (Environmental and Social Standard (ESS) 2, footnote 15).
Project actor	In this GPN, the term “project actor” refers to project workers (defined below) as well as government civil servants working in connection with the project, for example, those who are responsible for carrying out project activities but whose employment is not legally transferred to the project (see ESS2, paragraph 8 and the Guidance Note to ESS2, GN8.1-8.3).
Project worker	<p>The term “project worker” refers to:</p> <ul style="list-style-type: none"> (a) People employed or engaged directly by the Borrower (including the project proponent and the project implementing agencies) to work specifically in relation to the project (<i>direct workers</i>); (b) People employed or engaged through third parties to perform work related to core functions of the project, regardless of location (<i>contracted workers</i>); (c) People employed or engaged by the Borrower’s primary suppliers¹ (<i>primary supply workers</i>); and (d) People employed or engaged in providing community labor² (<i>community workers</i>). <p>Further detail on each category of project worker is set out in ESS2 and in the</p>

¹ “Primary suppliers’ are those suppliers who, on an ongoing basis, provide directly to the project goods or materials essential for the core functions of the project.” See ESS2, footnote 5.

² “Community labor” is discussed in ESS2, paragraph 34: “Projects may include the use of community workers in a number of different circumstances, including where labor is provided by the community as a contribution to the project, or where projects are designed and conducted for the purpose of fostering community-driven development, providing a social safety net or providing targeted assistance in fragile and conflict-affected situations.”

Guidance Note to ESS2. ESS2 applies to project workers, including full-time, part-time, temporary, seasonal, and migrant workers. See examples in Section 3, Table 1, below.

Sexual and Gender minorities

Persons whose sex, gender, sexual orientation, gender identity and/or gender expression differ from those of the majority of the surrounding society. The term **LGBTI+** is also used:

Gender: Gender refers to social, behavioral, and cultural attributes, expectations, and norms associated with being male or female.

Sexual orientation: Each person’s enduring capacity for profound romantic, emotional and/or physical feelings for, or attraction to, person(s) of a particular sex or gender. It encompasses hetero-, homo- and bi-sexuality and a wide range of other expressions of sexual orientation.

Gender identity: Each person’s deeply felt internal and individual experience of gender (e.g., of being a man, a woman, in-between, neither, or something else), which may or may not correspond with the sex they were assigned at birth or the gender attributed to them by society. Note that this sense of self is not related to sexual orientation. Gender identity is internal; it is not necessarily visible to others.

Gender expression: The way we show our gender to the world around us, through things such as clothing, hairstyles, and mannerisms, to name a few.

Cisgender: The term “cisgender” refers to a person whose gender identity corresponds with the sex the person had or was identified as having at birth.

Gender minorities: Individuals whose gender identity/expression does not fit into the distinct categories of male or female, or “cisgender.” This encompasses transgender identities, as well as those exhibiting a non-conforming expression of gender. This term includes “third gender” individuals because their identity does not fit into the gender binary.

Additional definitions for terms related to gender and gender minorities are set out in the ESF Good Practice Note, *Non-Discrimination: Sexual Orientation and Gender Identity*.³

Sexual Assault

Sexual activity with another person who does not consent. It is a violation of bodily integrity and sexual autonomy and is broader than narrower conceptions of “rape,” especially because (a) it may be committed by other means than force or violence, and (b) it does not necessarily entail penetration (UN Glossary on Sexual Exploitation and Abuse 2017, pg. 6).

³ World Bank. 2019. *ESF Good Practice Note (GPN) on Non Discrimination: Sexual Orientation and Gender Identity*. Washington, DC: International Bank for Reconstruction and Development/World Bank. Available at: <https://thedocs.worldbank.org/en/doc/590671570796800429-0290022020/original/GoodPracticeNoteSOGI.pdf>

Sexual exploitation and abuse (SEA) **Sexual exploitation:** any actual or attempted abuse of a position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another (UN Glossary on Sexual Exploitation and Abuse 2017, pg. 6).

Sexual abuse: actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. Sexual abuse is a broad term, which includes a number of acts including **rape** and **sexual assault**, among others (UN Glossary on Sexual Exploitation and Abuse 2017, pgs. 5-6).

Sexual harassment (SH) Any form of unwanted verbal, non-verbal, or physical conduct of a sexual nature with the purpose or effect of violating the dignity of a person, in particular when creating an intimidating, hostile, degrading, humiliating, or offensive environment. This may include unwelcome sexual advances, or requests for sexual favors, and may take place through online activity or mobile communications as well as in person.

Survivor-centered approach The survivor-centered approach is based on a set of principles and skills designed to guide professionals—regardless of their role—in their engagement with survivors (predominantly women and girls but also men, boys, and gender minorities) who have experienced sexual or other forms of violence. The survivor-centered approach aims to create a supportive environment in which the survivor’s interests are respected and prioritized, and in which the survivor is treated with dignity and respect. The approach helps to promote the survivor’s recovery and ability to identify and express needs and wishes, as well as to reinforce the survivor’s capacity to make decisions about possible interventions, including non-intervention. In SEA/SH cases involving children, the survivor-centered approach is guided by an assessment of the best interests of the child (see Section 3, Box 3, below).

Violence against women

Article 1 of the 1993 UN *Declaration on the Elimination of Violence against Women* defines violence against women as any act of GBV that results in, or is likely to result in, physical, sexual, or psychological harm or suffering to women, including threats of such acts, coercion, or arbitrary deprivation of liberty, whether occurring in public or in private life. Article 2 of the Convention further states that violence against women shall be understood to encompass, but not be limited to, the following: (a) physical, sexual, and psychological violence occurring in the family, including battering, sexual abuse of female children in the household, dowry-related violence, marital rape, female genital mutilation, and other traditional practices harmful to women, non-spousal violence and violence related to exploitation; (b) physical, sexual, and psychological violence occurring within the general community, including rape, sexual abuse, sexual harassment, and intimidation at work, in educational institutions and elsewhere, trafficking in women, and forced sex work; (c) physical, sexual, and psychological violence perpetrated or condoned by the State, wherever it occurs. The term **violence against women and girls** is also used.

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1. Introduction

1. **No country, community, or economy can achieve its potential or meet the development challenges of the 21st century without the full, equal, and safe participation of all.** The World Bank's investments in Human Development (HD) sectors support education and well-being, empower the most vulnerable, and assist in the creation of jobs, while helping countries build their human capital, including through increased voice and agency for women and children. However, HD Operations, with their high levels of human interaction, can also expose people to the risk of gender-based violence (GBV) – undermining the very investments made to support these sustainable outcomes.
2. **Every community in which the World Bank has operations includes people who have experienced or will experience GBV.** About 1 in 3 women worldwide have been subjected to either physical and/or sexual intimate partner violence (IPV) or non-partner sexual violence, both manifestations of GBV.¹ World Bank-financed projects can increase the risk of several forms of GBV, in particular sexual exploitation and abuse (SEA), and sexual harassment (SH) (hereafter referred to as SEA/SH), in both public and private spaces, in person and online, by a range of perpetrators and in a number of ways.
3. **The Environmental and Social Framework (ESF), which applies to all World Bank Investment Project Financing (IPF) on or after October 1, 2018, is an important policy foundation for the Bank's commitment to address SEA/SH.** The ESF's ten Environmental and Social Standards (ESSs) set out the requirements for Borrowers relating to the identification, assessment, and mitigation of environmental and social (E&S) risks and impacts associated with projects financed by the Bank. While the ESF itself does not address SEA/SH as a separate area of social risk, various ESSs contain requirements for the Borrower that are directly relevant to SEA/SH, including regarding non-discrimination and harassment in the workplace, workplace health and safety, risks to community health and safety, and handling of grievances, which are elaborated in the ESS Guidance Notes. The Bank needs to review, support, and record the Borrower's assessment, mitigation, and monitoring of these risks and impacts as part of its due diligence. Table 2, below, has a full list of these ESSs and directly relevant requirements, including:
 - ESS1: Assessment and Management of Environmental and Social Risks and Impacts;
 - ESS2: Labor and Working Conditions;
 - ESS4: Community Health and Safety;
 - ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement;
 - ESS7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities; and
 - ESS10: Stakeholder Engagement and Information Disclosure.

¹ WHO (World Health Organization). 2021. "Violence against Women: Key Facts." Available at: <https://www.who.int/news-room/fact-sheets/detail/violence-against-women>

4. **While the ESSs detail requirements for the Borrower, the Bank’s responsibilities are detailed in the [Environmental and Social Policy \(ES Policy\)](#), [Environmental and Social Directive for Investment Project Financing \(ES Directive\)](#) and the [Bank Directive on Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups](#).** The ES Policy and these two Directives, and the ESS, are mandatory for the Bank and Borrower, respectively. Supplementary material, like this Good Practice Note (GPN), are advisory in nature and not mandatory. They provide task teams with additional information, tools, and good practice to help meet these requirements and responsibilities.
5. **The World Bank has developed this GPN for task teams supporting Borrowers in identifying, assessing, and mitigating SEA/SH risks in HD Operations under the principles and provisions of the ESF.** It builds on World Bank experience, relevant international instruments, and good international industry practices, including those of other development partners. While Bank task teams are the primary audience, this GPN also aims to contribute to a growing knowledge base on the subject and is for use by all development partners.
6. **This GPN covers how SEA/SH risks may arise in HD Operations, describes the Bank’s responsibilities to screen HD Operations for SEA/SH risk, and provides guidance on key mitigation measures.** It applies to World Bank IPF projects that include activities related to Health, Nutrition, Population, Education, Social Protection, and Jobs (referred to in this GPN as HD Operations). It introduces tools and approaches to addressing SEA/SH risk in HD Operations that reflect emerging good practice consistent with the key ESF principles of proportionality and appropriateness. The GPN represents a summary of current good practice and will be updated periodically to reflect lessons learned. While this GPN focuses on SEA/SH perpetrated by project actors, other forms of GBV (such as intimate partner violence) may be relevant to Bank-supported projects and should be identified and addressed as part of social risk management. Further, while addressing SEA/SH is a necessary precondition, it is not a substitute for full and equal participation of women and girls in the design, implementation, and benefits of the project.
7. **The effectiveness of ESF implementation is highly contingent on the Borrowers’ commitment and capacity to identify and address project E&S risks and impacts, including SEA/SH.** To this end, the Bank, as part of its due diligence, assesses and supports the Borrower’s capacity to address such risks throughout the project life cycle. Although the ESF works primarily at project level, it is designed to promote Borrower capacity through strengthening national E&S frameworks. The ESF may also support capacity building through the use of overview assessments of the Borrower’s E&S frameworks, including in specific sectors. One distinguishing feature of many HD Operations is that they deal with entire systems (Health, Education, or Social Protection) and, unlike most infrastructure projects, are often not restricted to geographically localized interventions. This offers opportunities for working with upstream ministries and agencies that play a critical role in addressing GBV issues in a country, and SEA/SH

issues as a subset of GBV. However, the system-wide nature of HD Operations may also present challenges in addressing and mitigating GBV risks.

2. Approach and Structure of the GPN

8. **The approach of this GPN is to use both the requirements and flexibility of the ESF to enable the application of emerging good practice to maximum effect.** As such, the GPN sets out good practice in assessing SEA/SH risks in HD Operations, and identifying and applying mitigation measures¹ to address these risks. It focuses on project-level social risk assessment and mitigation through the different stages of preparation and implementation, rather than on the Bank's work on GBV and SEA/SH prevention, although there are synergies.² Where HD Operations finance major civil works, the guidance in the [GPN on Addressing SEA/SH in IPF Involving Major Civil Works](#) (Civil Works GPN) is applicable to those project components.
9. **This GPN provides recommendations on mitigating the risks of SEA/SH perpetrated by project workers and by government civil servants working in connection with the project, referred to collectively as "project actors."**
10. **In accordance with the ESF, SEA/SH risks are addressed throughout the life cycle of the project, from identification through preparation and design, appraisal, approval, and implementation.** Agreement between the Bank and Borrower on appropriate mitigation actions to address SEA/SH risks is documented in the Environmental and Social Commitment Plan (ESCP), which forms part of the legal agreement for the project approved by the Board. The actual implementation of relevant mitigation actions may occur progressively, in accordance with the ESF, provided that appropriate mitigations are in place before carrying out project actions that may cause material adverse risks or impacts.³
11. **The ESCP is crucial to this flexibility and accountability, as it details the agreement between the Bank and Borrower on what the measures and actions are, and by when, by whom and with what budget they are to be completed.** The application of these measures and their timing will depend on the particular circumstances of each project, reflecting the level of risk and the nature of project activities.⁴ The focus is on achieving outcomes that balance risks with development priorities, and agreeing on a manner and timeframe that are responsive to the specific context and SEA/SH risks of the project.
12. **The following sections cover key SEA/SH concepts, risk screening, and mitigation measures.** Section 3 provides an overview of terminology and concepts relevant to SEA/SH and illustrates how such risks and impacts arise in HD Operations; Section 4

¹ SEA/SH risk mitigation measures refer to the actions to reduce the risk that people will be exposed to/experience SEA/SH by addressing the factors where project actors or beneficiaries (and the project) may create or heighten that risk (e.g., funding is provided for schools where grounds might have inadequate lighting or lack perimeter fences).

² SEA/SH prevention generally refers to taking action to stop SEA/SH from first occurring (e.g., scaling up activities that promote gender equality, or working with communities, particularly men and boys, to address practices that contribute to SEA/SH).

³ ESS1, paragraph 16.

⁴ ESS1, paragraphs 16 and 17.

discusses SEA/SH risk assessment and introduces the SEA/SH Risk Screening Tool (presented in further detail in Annex 1); and Section 5 describes possible mitigation measures for SEA/SH risks in HD Operations. Additional resources are set out in the Bibliographies and Annexes. Annexes 2-4 include specific considerations for each of the three HD Sectors: Education; Social Protection and Jobs; and Health, Nutrition and Population. Annex 5 lays out a step-by-step guide to actions by Task Team Leaders (TTLs) throughout the project cycle.

3. Understanding SEA/SH Risks in HD Operations

13. **As acknowledged in the GBV Task Force Action Plan,¹ the Bank will continue to expand its understanding of effective approaches to mitigate and respond to SEA/SH.** SEA/SH risks may manifest differently in different development sectors and may require different methods of assessment and mitigation by the Borrower. The diversity of HD Operations, with a high level of person-to-person activity, multiple layers of organizational hierarchy, and a focus on the delivery of essential services that need to be made available to every person, indicates the need for a customized approach to risk management. The variations include system-wide interventions; public sector capacity building; infrastructure; developing resources/distributing supplies; income support/targeted interventions; pension and insurance mechanisms; training and skills building; and public-private partnerships.
14. **In any of these cases, the provision of services or goods to people may increase the level of person-to-person contact, including with vulnerable groups,** such as children or people with disabilities accessing health care or education, or families accessing social assistance. It may also involve both public and private sector employees. Such factors underscore the need to adapt E&S risk management tools, including grievance mechanisms and labor procedures, to the specific project context and the project activities. Project actors are also at risk of experiencing SEA/SH, particularly in the HD sectors. Research suggests that people working in occupations such as health care, teaching, and social work, are at higher risk than others of experiencing such violence.²
15. **As Health, Education and Social Protection agencies can play a key role in preventing and mitigating GBV, HD Operations can make a strong contribution to addressing the drivers of SEA/SH as part of project design.** For example, educating children, youth, and adult students about GBV and SEA/SH issues could have a substantial impact on addressing these issues in the education sector and beyond. Similarly, making efforts to raise awareness and improve procedures to address GBV in hospitals, clinics, and other health facilities could make a significant difference to support for survivors of SEA/SH. Finally, ensuring that social assistance programs are provided in a context where SEA/SH is eliminated could have far-reaching impacts on the households and individuals in need of those services. While this GPN focuses on project-level risk assessment and mitigation in accordance with the ESF, Box 1 below highlights examples of project activities that aim to address the drivers of SEA/SH.

¹ World Bank. 2017. Working Paper. Global Gender-based Violence Task Force: Action Plan for Implementation. <https://documents.worldbank.org/en/publication/documents-reports/documentdetail/206731510166266845/global-gender-based-violence-task-force-action-plan-for-implementation>

² ILO (International Labour Organization). 1998. Press release. "Violence on the Job – a Global Problem." https://www.ilo.org/global/about-the-ilo/newsroom/news/WCMS_007970/lang--en/index.htm

Box 1. In Practice: HD Operations Addressing Drivers of SEA/SH

Strengthening Inclusion Efforts in Chilean Universities

In a project to support State Universities in Chile, SH and GBV were highlighted as challenges that women face in higher education. The project included activities to support the development and strengthening of Gender Action Plans to promote gender equity in different dimensions and address GBV and SH.

Choice-Based Payment System in Zambia

The Girls' Education and Women's Empowerment and Livelihoods Project (GEWEL) in Zambia has developed an innovative, multi-provider, digital payment system that is centered on beneficiary choice. This contributes to a secure and safer way of empowering women and contributes to reduced violence, including through regularity and predictability of payments.

Identifying Risks of SEA/SH in HD Operations

16. **There are many ways in which the risks and impacts of SEA/SH arise in the context of IPF, and these can vary by sector and setting.** Generally, SEA/SH risks and impacts are driven by power dynamics. This GPN focuses on three types of GBV – sexual exploitation, sexual abuse and sexual harassment (defined in the Glossary).³ It also considers some specific aspects of sexual abuse and exploitation of children. Box 2 sets out examples of how SEA/SH incidents may arise in HD Operations. Annexes 2-4 provide further sector-specific examples of sexual exploitation, sexual abuse and sexual harassment in HD Operations.

Box 2. Examples of How SEA/SH May Arise in Bank-financed HD Operations

Sexual exploitation may occur when a project actor restricts access to a project benefit or service in order to extract sexual favors. For example:

- A member of a selection committee requests an applicant to send sexually explicit images of themselves in exchange for enrolment in an education program;
- A payment operator refuses to pay a beneficiary unless she performs a sexual act;
- A healthcare worker refuses to provide service to an LGBTI+ person unless they perform a sexual act; or
- A health service provider demands sexual favors in order provide birth control to a woman.

Sexual abuse may occur when a project actor uses force or an unequal power relation vis-a-vis another to perpetrate or threaten an unwanted sexual act. For example:

- A teacher sexually assaults a student;

³ This GPN does not address other forms of GBV that do not constitute SEA/SH (for example, IPV and non-SEA/SH physical assault).

- A teacher threatens to disclose a sexual or gender minority student’s identity to their family or school community unless they perform sexual favors;
- A community volunteer sexually assaults a beneficiary during a home visit; or
- A medical professional sexually assaults a patient during a physical exam.

Sexual harassment may occur when a project actor makes unwelcome sexual advances or requests sexual favors:

- A teacher asks all male/female students to greet him or her with a kiss on the cheek every day;
- A project actor makes repeated advances or sends sexually explicit text messages to a co-worker;
- A project actor regularly uses homophobic slurs against a colleague; or
- A project manager sends a co-worker an email with an offensive picture that is sexually explicit.

17. This GPN focuses on assessing and mitigating risks of SEA/SH perpetrated by project actors that arise in relation to Bank projects. Perpetrators of SEA/SH may be project workers or others involved in delivering services or products; however, they may also be members of the general public. Depending on the task team’s assessment of the risk, mitigation measures can also be adapted to reflect risks arising from different groups. Government civil servants are considered “project workers” when their employment is transferred to the project. Other civil servants who work in connection with the project are considered “project actors.”⁴ In the context of a Bank project, “project workers” are defined in accordance with ESS2 and this will depend on the project structure and activities. ESS2 requires Borrowers to consider how project workers will be managed and how they will interact with local communities. Borrowers also must apply occupational health and safety (OHS) measures. The standard distinguishes between different categories of project workers to reflect the different degrees of control and influence that a Borrower may have over their working conditions and treatment.⁵ Some examples of project actors are set out in Table 1 below.

⁴ See ESS2, paragraph 8 and Guidance Note to ESS2, paragraph GN8.1. For those civil servants who have had an effective legal transfer of their employment/engagement to the project, all provisions of ESS2 will apply. For those who have not had such a transfer of employment, but who are working in connection with the project, they remain subject to the terms and conditions of their existing public sector employment agreement and arrangement, and only those ESS2 requirements relating to child labor and minimum age (ESS2 paragraphs 17-19) and OHS (ESS2 paragraphs 24-30) apply.

⁵ Guidance Note to ESS2, paragraph GN3.1 “Project workers can be engaged in many different ways. It is important to identify the different types of workers that may be engaged in the project and describe them in the labor management procedures that are prepared for the project (see paragraph 9 of ESS2), together with the way in which the ESS2 requirements apply to each type of project worker. The four categories of project workers referred to in paragraph 3 of ESS2 reflect the differing degrees of control and influence that a Borrower may have over the working conditions and treatment of different types of project workers. The requirements under ESS2 are different depending on the type of project worker involved.”

Table 1: Examples of Project Actors

Type of Project Actor	Overall Definition	Project labor management procedures identify the different types of workers that may be engaged in the project ⁶		
		Education Examples	Health, Nutrition and Population Examples	Social Protection and Jobs Examples
Project workers	<ul style="list-style-type: none"> • <i>Direct workers:</i> people employed or engaged directly by the Borrower (including the project proponent and the project implementing agencies) to work specifically in relation to the project, including civil servants who are directly hired by the project implementation unit (PIU) • <i>Contracted workers:</i> people employed or engaged through third parties to perform work related to core functions of the project, regardless of location • <i>Primary supply workers:</i> people employed or engaged by the Borrower’s primary suppliers⁷ • <i>Community workers:</i> people employed or engaged in providing community labor⁸ 	<ul style="list-style-type: none"> • PIU staff • Trainers hired by the PIU to support project activities • Guards employed by a security firm and contracted to work on the project • Volunteers providing services as part of the project delivery 	<ul style="list-style-type: none"> • PIU staff • Health workers hired by the PIU to deliver project activities • Cleaners and orderlies employed by a services firm and contracted to work on the project 	<ul style="list-style-type: none"> • PIU staff • Trainers hired by the PIU to support project activities • Employers • Employees of digital payment providers engaged to provide services on a cash transfer project • Public works supervisor hired directly by the PIU • Community workers engaged in cash-for-work programs or for project outreach
Civil servants working in connection with the project	Government civil servants working in connection with the project, for example who are responsible for carrying out project activities, but whose employment is not legally transferred to the project	<ul style="list-style-type: none"> • Teachers and school administrators employed by the Ministry of Education and carrying out project activities but whose employment is not transferred to the project • Ministry of Education civil servants responsible for implementing project activities but whose employment is not transferred to the project 	<ul style="list-style-type: none"> • Doctors, nurses, and other health care workers employed by the government and carrying out project activities but whose employment is not transferred to the project • Ministry of Health civil servants responsible for implementing project activities but whose employment is not transferred to the project 	<ul style="list-style-type: none"> • Social workers employed by the government and carrying out project activities but whose employment is not transferred to the project • Public work supervisor responsible for overseeing project activities but whose employment is not transferred to the project

18. **This GPN also recommends approaches to stakeholder engagement, information sharing, and grievance redress consistent with ESS1 and ESS10.** In the context of a Bank project, “project-affected parties” are defined in ESS10 to include individuals or groups who may have different concerns and priorities about project impacts, mitigation mechanisms, and benefits, and who may require different or separate forms of engagement, especially if they are disadvantaged or vulnerable. “Other interested parties” may include individuals or groups, such as CSOs, who are less directly affected by the project, but have concerns about its objectives and outcomes. Meaningful consultation considers and responds to feedback from stakeholders in a manner appropriate to the nature of their interests and the risks and impacts of the project. **Table 2** includes examples of the groups that may be relevant for stakeholder engagement activities in an HD Operation.

Table 2. Stakeholder Engagement: Examples of Project-affected Parties and Other Interested Parties		
Project-affected parties	Individuals or groups who are affected or likely to be affected by the project	<ul style="list-style-type: none"> • Beneficiaries, including students, patients, recipients of support and their families, recipients of training • General public in communities where project interventions are occurring • Organizations representing vulnerable or disadvantaged individuals or groups • Ministries and civil servants that are not working in connection with the project but who may be affected by project activities
Other interested parties	Stakeholders who are not project-affected parties	<ul style="list-style-type: none"> • General public • Ministries (health, education, social protection) • UN agencies and other international organizations • Civil society, private sector, or other organizations or institutions not connected with project activities

19. **While this GPN focuses on SEA/SH perpetrated by project actors, the Borrower assessment or the Bank’s risk screening may identify risks of SEA/SH perpetrated by people who are not project actors.** For example, a project may identify:

- risks of SEA/SH by members of the public against project actors in the course of their work – e.g., against health care workers or support workers in fragile settings;
- risks of SEA/SH perpetrated against beneficiaries by people who work in a facility but who are not “project actors” because they are not working on project activities;
- risks of SEA/SH occurring between children, such as in a residential facility or school;

⁶ See ESS2, paragraph 3, Guidance Note to ESS2, paragraph GN3.2 and GN3.3.

⁷ “Primary suppliers” are those suppliers who, on an ongoing basis, provide directly to the project goods or materials essential for the core functions of the project.

⁸ Projects may include the use of community workers in a number of different circumstances, including where labor is provided by the community as a contribution to the project, or where projects are designed and conducted for the purpose of fostering community-driven development, providing a social safety net (e.g., food-for-work programs and public works as safety net programs), or providing targeted assistance in fragile and conflict-affected situations. See ESS2, paragraph 34, and Guidance Note to ESS2, GN34.1-34.4.

- risks of SEA/SH against individuals on their way to and from a project facility, such as a school or a clinic.

Where relevant, these risks should be assessed and addressed in accordance with the ESSs,⁹ including ESS1, ESS2 (for OHS issues) and ESS4 (for community health and safety). Mitigation measures may need to be adapted to take into account the project's level of influence and control over the conduct of people who are project actors and those who are not. Consistent with the general approach to incident response and referral set out in Section 5, any complaints or allegations of SEA/SH made to the project grievance mechanism (GM) should be directed through a relevant referral pathway to qualified GBV service providers, regardless of the identity of the perpetrator.

Considerations for Addressing SEA/SH Against Vulnerable Individuals or Groups

20. HD Operations should pay particular attention to risks of SEA/SH for vulnerable individuals or groups, including children and LGBTI+ individuals. Certain individuals or groups are particularly vulnerable to SEA/SH. Groups of women and girls in excluded populations or in vulnerable situations, such as indigenous women, refugee or displaced women, migrants or domestic workers, face greater levels of violence.¹⁰ Children who display non-normative sexualities or expressions of gender are more likely to experience physical and sexual abuse by a family member or caregiver compared to their cisgender and heterosexual siblings. HD Operations frequently include children and other vulnerable groups among the intended beneficiaries of a program, intervention or service – as students, patients or community members. Such projects should consider methods to safely include children or vulnerable groups and organizations representing their interests in stakeholder engagement processes. Project consultations should provide a safe enabling environment for conversation, with consideration of social or environmental constraints that may inhibit participation, and should be facilitated by actors with the appropriate expertise. Project information disclosure should include information about risks and impacts that may affect children and vulnerable groups as project-affected people.¹¹ Particular considerations for children as survivors of SEA/SH are set out in Box 3 below. Considerations for LGBTI+ individuals as survivors of SEA/SH are set out in Box 4.

21. Some individuals or groups are particularly vulnerable to SEA/SH due to overlapping vulnerabilities. Women with disabilities and elderly women are often more vulnerable to all forms of violence, as are sexual and gender minorities and those from minority ethnic groups. Women and children in low castes or social hierarchies where sexual violence is used to punish transgressions, young unaccompanied boys and girls and those

⁹ ESS1 requires Borrowers to assess all relevant E&S risks and impacts of a project, including those that are direct, indirect or cumulative – this includes discussion of impacts that likely or reasonably foreseeable, even if they will occur at a later time or in a different location (ESS1, paragraph 23, see footnotes 20, 21 and 22).

¹⁰ See Violence Against Women and Girls Resource Guide Introduction, pg. 6.

¹¹ ESS10 and World Bank. 2021. *Bank Directive: Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups*. Washington, DC: International Bank for Reconstruction and Development/World Bank. Available at: <https://ppfdocuments.azureedge.net/9598117e-421d-406f-b065-d3dfc89c2d78.pdf>

from poor and marginalized or displaced households are all especially vulnerable to SEA/SH. The risk of abuse, harassment, and violence can be more severe for sexual and gender minorities who face overlapping disadvantages, such as being a member of an ethnic minority, having a disability, or being poor. These intersectional risks should be considered when evaluating risks and designing mitigation measures in accordance with the [Bank Directive on Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups](#).

Box 3. Key Concepts in Relation to Children As Survivors of SEA/SH

Global efforts to combat child SEA/SH have contributed to developing a body of good practices for mitigating and responding to incidents of SEA/SH against children. This GPN highlights some specific good practices to define which acts constitute SEA/SH against children, to identify risk factors, and to respond to incidents of SEA/SH against children.

Examples of SEA/SH against children

Children are not considered able to provide consent to engage in sexual activity, because they do not have the ability and/or experience to anticipate the implications of an action, and they may not understand or be empowered to exercise their right to refuse. The World Bank considers children as anyone under the age of 18—even if national law may have a lower age—and, as such, not able to give free and voluntary consent.^a Mistaken belief regarding the age of the child and consent from the child is not a defense in SEA of children. Child exploitation involves children being engaged in any sexual activity in exchange for money, gifts, food, accommodation, affection, status, or anything else that they or their families need. The abusive relationship between the victim and perpetrator involves an imbalance of power where the victim's options are limited. Child sexual exploitation manifests in different ways – it can involve an older perpetrator exercising financial, emotional, or physical control over a young person, or opportunistic or organized networks of perpetrators who profit financially from trafficking children among different locations to engage in sexual activity.^b

Acting in the best interests of a child who has experienced SEA/SH

Where a child experiences SEA/SH, good practice requires that GBV service providers act in the best interests of the child. Article 3 of the UN Convention on the Rights of the Child states that children have the right to have their best interests assessed and taken into consideration in all actions that concern them, both in the public and private spheres.^c The best interest of the child is determined by a variety of individual circumstances, such as the age, gender, level of maturity, and experiences of the child. Other factors also determine well-being, such as the presence or absence of parents, the quality of the relationships between the child and their family or caregivers, the physical and psychosocial situation of the child and their protection situation. All of these circumstances and elements should be considered and balanced against each other by any decision-maker having to consider a child's best interests.

In responding to allegations of SEA/SH, child survivors should be active participants in defining their best interests. This includes being consulted about their needs and concerns, and having their views taken into account in decisions that will affect them. Where possible, an adult caregiver should be present and provide consent for decisions in responding to allegations of SEA/SH.

A **best interest assessment (BIA)** refers to an assessment of children's best interests conducted by organizations with required expertise. It can take various forms and may not necessarily be called a

“best interest assessment.” A BIA requires consultation with the child and consideration of the child’s wishes, as well as evaluation of the other factors needed to secure the physical and emotional safety of the child. A BIA may ultimately result in a decision to go against the child’s wishes if those wishes would not be in the child’s best interest. This is done with consideration of the child’s age and ability to comprehend their own situation.^d

In some circumstances, a formal UNHCR process called a **best interests determination (BID)** is followed when making particularly important decisions affecting a child.^e This may be needed, for example, when a child survivor comes forward with an allegation of SEA/SH.

National laws and regulations on child SEA

Legal requirements for determining how SEA/SH incidents involving children must be reported and addressed may vary depending on the country and institutional context. Certain persons may have the authority to make decisions about the child’s best interests, such as a magistrate or social worker, and specific processes may need to be followed. GBV service provider mapping should assess whether protocols take into consideration child survivors’ needs and should identify the availability of child-friendly services and services that are mandated to determine the best interests of children, including by conducting a BIA or BID.

Harmful Sexual Behavior – SEA/SH by people under 18

When a child perpetrates SEA/SH against another child, this may be referred to as “peer-on-peer” abuse or exploitation, or “harmful sexual behavior.” While a range of sexual behaviors in children are developmentally normal, some behavior can indicate or cause harm – for example, if the behavior is coercive, threatening, degrading, or aggressive.^f In such cases, response to an incident must follow specific protocols to act in the best interests of both the survivor and the perpetrator. As this GPN focuses on SEA/SH perpetrated by project actors, it is important to note that some project actors in Bank-financed projects may be under the age of 18.^g Prohibitions on sexual activity with people under 18 will also apply to these individuals, just as they would to another project actor. Further, the project GM may receive allegations about SEA/SH that are perpetrated by someone who is not a project actor, but who is under 18, and must be prepared to handle such allegations appropriately.

^a Articles 1 of the UN “Convention on the Rights of the Child” defines children as those under the age of 18.

<https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-child>

The UN Secretary General’s Bulletin on Special Measures for protection from sexual exploitation and abuse, October 9, 2003 ST/SGB/2003/13 also defines children as anyone under the age of 18 and explicitly prohibits sexual activity with a child regardless of the age of majority or age of consent locally (paragraph 3.2(b)).

<https://www.unhcr.org/protection/operations/405ac6614/secretary-generals-bulletin-special-measures-protection-sexual-exploitation.html>

^b Keeping Children Safe. 2019. *The International Child Safeguarding Standards*. London: KCS. “Definitions of harm,” pg. 6.

<https://www.keepingchildrensafe.global/wp-content/uploads/2020/02/KCS-CS-Standards-ENG-200218.pdf>

^c See UN Committee on the Rights of the Child (CRC) *General Comment No. 14 (2013) on the right of the child to have his or her best interests taken as a primary consideration (art. 3, para. 1)*, 29 May 2013, CRC/C/GC/14, available at: <https://www.refworld.org/docid/51a84b5e4.html>

^d UNHCR (UN High Commissioner for Refugees). 2021. *UNHCR Best Interests Procedure Guidelines: Assessing and Determining the Best Interests of the Child*. May 2021. Available at:

<https://www.refworld.org/docid/5c18d7254.html>

^e The BIA should be distinguished from a BID, which is a formal UNHCR process that has strict procedural safeguards. For more information on BIA and BID, and when each is appropriate, see UNHCR BIP Toolbox, at: <https://www.unhcr.org/handbooks/biptoolbox/>

^f Ey and McInnes. 2020, Harmful Sexual Behaviour in Young Children and Pre-Teens; An Education Issue. London: Routledge. B.

^g See ESS2, paragraphs 17-19, which specify the circumstances in which a child may be employed or engaged in connection with a Bank-financed project.

Box 4. Key Concepts in Relation to Sexual and Gender Minorities As Survivors of SEA/SH

Globally, lesbian, gay, bisexual, transgender, and intersex (LGBTI+) people face disproportionate levels of violence and abuse at the hands of family members, colleagues, classmates, intimate partners, neighbors, and strangers. Transgender people in particular may experience far higher rates of violent crimes, including rape, and sexual and physical assault, than cisgender women and men.^a

In insecure, fragile, and conflict situations, or post-conflict contexts, already marginalized LGBTI+ people can be at heightened risk of sexual abuse and violence due to the collapse of institutions, justice systems, and safe spaces, and by the breakdown of already weak community and family bonds.^b LGBTI+ individuals may also have fewer resources and options available to them, as a result of higher unemployment rates and lack of access to adequate housing, health services, and financial services.

Examples of SEA/SH against sexual and gender minorities

LGBTI+ people may experience similar forms of SEA/SH as cisgender and heterosexual people, but they also may experience specific forms of abuse, harassment, and exploitation. For example:

- School-aged children who are or are perceived to be sexual and gender minorities are at increased risk of abuse from teachers and peers, including homophobic verbal harassment, sexual and physical violence at school, and cyber-bullying.^c
- In many countries, common forms of violence experienced by lesbian and bisexual women include honor killings, “corrective” rape,^d and forced marriages, where families marry them to men without their consent, often with threats and violence.

The survivor-centered approach when responding to allegations of SEA/SH against LGBTI+ people

Although sexual and gender minorities are particularly vulnerable to SEA/SH, most responses and actions aimed at reducing sexual abuse and violence focus on heterosexual and cisgender women and girls. Access to legal, social, and psychological assistance for victims is frequently directed at girls and women with the assumption that they are heterosexual, leaving sexual and gender minorities behind.

In responding to incidents of SEA/SH against LGBTI+ survivors, it is important to be aware that sexual and gender minorities may be at increased risk of violence and harassment from law enforcement, in homeless shelters, and in healthcare settings. Sexual and gender minorities can experience great difficulty in accessing justice or legal redress. In contexts where sexual activity between people of the same sex is criminalized,^e LGBTI+ individuals experience structural violence, including police extortion and abuse.^f Even in contexts where there is a supportive legal framework, many fear their report will not be taken seriously or the police will further abuse them. Due to a lack of anonymity, reporting a crime can lead to increased social stigma and discrimination.

For these reasons, adherence to the survivor-centered approach is critical to ensure that the process of reporting an SEA/SH allegation does not lead to further victimization or re-traumatization of an LGBTI+ survivor.

For further information on discrimination affecting sexual and gender minorities, refer to the [ESF Good Practice Note: *Non-Discrimination Against Sexual and Gender Minorities*](#).

^a UN General Assembly. 2019. Report of the Independent Expert on protection against violence and discrimination based on sexual orientation and gender identity. A/74/181. Available at: <https://documents-dds-ny.un.org/doc/UNDOC/GEN/N19/220/72/PDF/N1922072.pdf?OpenElement>

^b World Bank. 2020. “Sexual Orientation & Gender Identity in Contexts Affected by Fragility, Conflict and Violence.” Discussion Paper. Washington DC: World Bank. Available at: <https://openknowledge.worldbank.org/bitstream/handle/10986/33722/Sexual-Orientation-and-Gender-Identity-in-Contexts-Affected-by-Fragility-Conflict-and-Violence-Discussion-Paper.pdf?sequence=1&isAllowed=y>

^c Krishnan, Anjali, Apurva Rastogi, Suneeta Singh and Lakshita Malik. 2014. “The Resilience of LGBTQIA Students on Delhi Campuses.” World Bank Education Resilience Approaches Paper. Available at: <https://documents1.worldbank.org/curated/en/869271468034231021/pdf/The-resilience-of-LGBTQIA-students-on-Delhi-campuses.pdf>

^d “Corrective” rape refers to rape perpetrated against lesbians and bisexual women in order to “correct” or “cure” their homosexuality.

^e As of 2020, 60 countries criminalized consensual same-sex sexual acts between adults, according to the International Lesbian, Gay, Bisexual, Trans and Intersex Association (ILGA) World Map on Sexual Orientation Laws, available at: <https://ilga.org/maps-sexual-orientation-laws>

^f World Bank. 2015. *Violence against Women and Girls Resource Guide: Brief on Violence Against Sexual and Gender Minority Women*, p.5. Washington, DC: World Bank. Available at: <https://documents1.worldbank.org/curated/en/573191611149890222/pdf/Violence-Against-Women-and-Girls-Resource-Guide-Brief-on-Violence-Against-Sexual-And-Gender-Minority-Women.pdf>

SEA/SH Drivers and Risk factors

22. **There are multiple risk factors and drivers of SEA/SH at an individual, relationship, community, institutional, and policy level.**¹² These include, among others: male-dominated decision-making and control over resources; cultural norms that justify or condone the use of violence against women and/or children as a form of conflict resolution or discipline; policies and laws that discriminate against women, girls, and boys; and a lack of institutions/services to support women and children survivors of violence. Since the risks of SEA/SH may begin with and exacerbate discrimination, the requirements of ESS1, paragraph 28, section (b) (iii) and the accompanying *Directive on Disadvantaged or Vulnerable Individuals or Groups* are important points of entry. Risk factors may change over time and vary by type of violence and are monitored and reassessed throughout the project lifetime.
23. **Project risk screening involves considering contextual risk factors at the national and local level as well as project-specific risk factors.** Identifying and understanding the interaction between project-related risk factors and contextual risk factors is critical to determining the SEA/SH risk:

¹² The broad ecological framework presented in the Violence Against Women and Girls Resource Guide Introduction is useful for a more comprehensive understanding of GBV risk factors. Available at: <https://www.worldbank.org/content/dam/Worldbank/document/Gender/VAWG%20Resource%20Guide%20Introduction%20July%202014.pdf>

- At the *national level*, risk factors can include: (1) low levels of women’s participation in education, labor force, or government; (2) high rates of GBV; (3) weak or poorly enforced legal frameworks for GBV, including GBV perpetrated against children; (4) weak GBV coordination response mechanisms; and (5) fragility, natural disasters, conflict, and other crises (e.g., epidemics/pandemics).
- At the *local level*, risk factors can include: (1) social norms accepting of SEA/SH, including condoning of male authority to discipline or control female/child behavior; (2) social norms that prevent survivors and witnesses from reporting incidents; (3) norms limiting women’s and girls’ mobility, autonomy, or interactions with men who are not family members; (4) availability and quality of legal, social, and health GBV support services; and (5) general low level of security, exposing project-affected parties to risks of GBV while, for example, traveling to school or living in unsafe boarding facilities.
- At the *project level*, risk factors can include : (1) project activities or modalities that may be perceived to challenge existing gender/social norms; (2) project activities that change the power structures or incentives on the ground, i.e., prices for commodities, changes in availability of services/supplies, or payments that change power/roles; (3) lack of buy-in from local formal or informal authorities; (4) lack of capacity to supervise project workers; (5) lack of a GM and protocols to respond to SEA/SH, limited knowledge of these mechanisms, or fear of retribution for reporting incidents of SEA/SH; (6) a lack of GBV service providers that survivors can effectively and confidentially access; and (7) lack of SEA/SH training, protocols, monitoring, and sanctions for project workers.

24. **SEA/SH risks can be exacerbated when a project actor is in a position of power over beneficiaries.** Transparency and oversight of interactions between project actors and beneficiaries can limit some of these risks. There are often opportunities to choose design features that can limit additional SEA/SH risk being introduced by HD Operations. These features generally entail: (a) limiting the power of individual project actors over beneficiaries and their access to project benefits and activities, for example, through digitizing services to eliminate opportunities for coercion (such as through mobile payments); (b) oversight of implementation (during beneficiary selection, transfers of benefits, or participation in project activities) by other individuals or groups of individuals (e.g., other beneficiaries, community members, local leaders); (c) introducing opportunities for beneficiaries to participate in monitoring and evaluation mechanisms, including satisfaction feedback mechanisms that allow beneficiaries to share information about delivery of services; and (d) accountability for abuses of power. In addition, information sharing, consultation, and engagement with beneficiaries about SEA/SH risks and mitigation measures can help to empower beneficiaries and counter power imbalances.

25. **While risk factors for SEA/SH of children are similar to the underlying causes of SEA/SH, they experience additional vulnerabilities.** Like SEA/SH against adults, risk factors for children include attitudes, beliefs, norms, and structures that promote gender

discrimination and gender inequality. Social norms that confer total power and authority over children to household or community heads may also be risk factors. Risk factors that are most relevant to children relate to the child’s family environment, including indications of violence or abuse occurring within the family, the caregiver’s/family’s willingness to protect the child from further abuse, access of the perpetrator/perpetrators to the child and/or caregivers, as well as child’s and caregiver’s perceived sense of safety.¹³

26. The Inter-Agency Standing Committee (IASC) Guidelines identify a number of at-risk groups and describe additional factors that contribute to increased risk of violence.¹⁴

Girls and adolescents who are forced into child marriage are victims of violence, and at greater risk of IPV than adult females. A 2014 UNICEF report found that globally one in three adolescent girls aged 15–19 years (or 84 million) in formal unions had been the victims of emotional, physical, or sexual violence committed by their partners or husbands.¹⁵ Early pregnancies and motherhood are also factors that increase the risk of violence for adolescent girls.¹⁶ These girls may be exposed to greater rates of sexual assault, sexual exploitation and abuse, and may suffer from lack of access to education.

27. In the case of men and boys, gender-inequitable norms related to expectations of masculinity and femininity can increase their exposure to some forms of sexual violence.¹⁷

28. Violence against sexual and gender minorities stems largely from social stigma, which is manifest through systemic denial of resources, services, and opportunities; through strict gender norms within family and community; and punitive or discriminatory laws. For lesbian, bisexual, and transgender women, both sexism and homophobia can lead to violence.

¹³ UNICEF (United Nations Children’s Fund)/IRC (International Rescue Committee). 2012. *Caring for Child Survivors of Sexual Abuse: Guidelines for health and psychosocial service providers in humanitarian settings*. New York: IRC. Pg. 126. Available at: <https://www.unicef.org/media/73591/file/IRC-CSS-Guide-2012.pdf.pdf>

¹⁴ Other children-at-risk groups include child heads of households; girls who bear children of rape and their children born of rape; separated or unaccompanied girls, boys, and orphans, including children associated with armed forces/groups ; girls and boys in detention; girls and boys living with HIV; girls and boys with disabilities; child victims of sexual exploitation and girls and boys who are survivors of violence. Intersectionality with race, ethnic groups, and sexual orientations also constitutes additional risks. See IASC (Inter-Agency Standing Committee). 2015. *Guidelines for Integrating Gender-based Violence Interventions in Humanitarian Action. Reducing risk, promoting resilience and aiding recovery*. IASC and Global Protection Cluster. Child Protection Thematic Area, Key considerations for At-Risk Groups, pgs. 10-12. Available at: https://gbvguidelines.org/wp/wp-content/uploads/2015/09/TAG-child-protection-08_26_2015.pdf

¹⁵ UNICEF (United Nations Children’s Fund). 2014. *Hidden in Plain Sight: A statistical analysis of violence against children*. Available at: <https://www.unicef.org/reports/hidden-plain-sight>, cited in WHO (World Health Organization). 2020. *Global Status Report on Preventing Violence Against Children 2020*. Geneva: World Health Organization. Part 1 – Current Global State of Preventing Violence Against Children, pg. 16. Available at: <https://www.unicef.org/sites/default/files/2020-06/Global-status-report-on-preventing-violence-against-children-2020.pdf>

¹⁶ *IASC Guidelines for Integrating Gender-Based Violence Interventions in Humanitarian Action*, Child Protection Thematic Area, Key considerations for At-Risk Groups, pg. 10.

¹⁷ Ibid.

GBV Service Providers and the Survivor-centered Approach

29. **GBV service providers are critical to the Borrower’s mitigation of SEA/SH.** Service providers play an important role in responding to the needs of those who have experienced SEA/SH. GBV service providers encompass those organizations/individuals which provide services needed for an incident response, including those with expertise to meet the specific needs of child survivors of GBV and SEA/SH. In accordance with international standards, GBV service providers provide any of the following services, either as standalone services or as packages: case management support, health services, psychosocial support, police and security support, access to legal services, livelihood support, and safe houses or shelters. When Borrowers identify GBV service providers, the quality of service provision should be a key consideration.¹⁸
30. **GBV service providers should apply a survivor-centered approach.** A qualified GBV service provider adopts a survivor-centered approach, in which the survivor’s safety is ensured, the survivor’s rights and decisions are respected and prioritized, and in which the survivor is treated with dignity and respect and confidentiality is assured. The approach helps to promote the survivor’s recovery and ability to identify and express needs and wishes, as well as to reinforce the survivor’s capacity to make decisions about possible interventions. The survivor-centered approach is discussed further in Section 5. In relation to SEA/SH affecting children, the survivor-centered approach is adapted to take into account the best interests of the child (see Box 3).
31. **GBV service providers can act as key partners to support implementation.** In addition to their role in responding to incidents of SEA/SH, GBV service providers should be considered as possible partners to support the implementation of relevant mitigation actions, including consultations, training, community awareness-raising, and GMs.

¹⁸ Resources for quality standards for GBV service providers are set out in the General Bibliography.

4. Assessing HD Operations for SEA/SH Risks

32. **For the Borrower, the assessment and mitigation of SEA/SH risks of a project is part of the Environmental and Social Assessment (ESA) under ESS1, as informed by initial scoping, and as relevant under ESS2 and ESS4.**¹ Additionally, stakeholder engagement under ESS10, especially consultations with project-affected parties, is an important source of SEA/SH risk identification.
33. **For the Bank task team, the initial screening of a project for SEA/SH risks is the start of a process that continues through the Bank's broader E&S due diligence.**² This includes not only reviewing the Borrower's assessment of SEA/SH risk but also providing guidance on mitigation measures that are appropriate and proportionate to those risks. A summary of the steps for Task team leaders is set out in Annex 5.

Bank Responsibility for SEA/SH Risk Classification and Due Diligence

34. **As part of its due diligence, under the leadership of the TTL, the Bank task team screens the project for SEA/SH risk, in consultation with the Borrower.** The starting point for this screening is the World Bank's [SEA/SH Risk Screening Tool](#). A key outcome of this risk screening is the classification of the project by the Bank as Low, Moderate, Substantial, or High risk of SEA/SH. The task team's Social Development (SD) Specialist is required to record this risk rating beginning at the Concept stage, in the Concept Environmental and Social Review Summary (ESRS).³ It is recommended that the SEA/SH risk rating be included in the Project Concept Note (PCN) for consideration at the PCN review meeting. On the basis of additional information gathered during project preparation, the risk should be updated as appropriate for the Quality Enhancement Review meeting or for the Decision Review meeting. As it may not be possible to complete an in-depth SEA/SH risk review at the concept stage, the rating should be reviewed and updated throughout Appraisal (Appraisal ESRS) and implementation (in the Implementation Status and Results Reports (ISRs)) as further information becomes available. To accommodate this, the Risk Screening Tool (the Tool) is designed to be updated by task teams throughout project design.
35. **The SEA/SH risk rating focuses on *pre-mitigation risks*, that is, without consideration for project-supported interventions.** As such, the rating can be modified if project characteristics change or more information regarding the project becomes known – for example, if a cash transfer program changes from an in-person distribution model (higher risk) to an electronic payment model (lower risk), or if a component of the project that was expected to result in labor influx is dropped. The risk rating should not be

¹ Paragraph 28 (b) (i) refers to threats to human security, which include risks of GBV or SEA/SH.

² As described in the ES Policy, Section C.

³ A SEA/SH risk rating of To Be Determined (TBD) may be entered at concept if the SEA/SH risk rating is unknown at the time; however, this must be updated to Low, Moderate, Substantial or High by the appraisal ESRS.

modified to reflect the addition or incorporation of SEA/SH risk mitigation measures, such as rollout of a CoC or establishment of a grievance mechanism.⁴

36. **The output of the Tool should be considered as a starting point for determining the SEA/SH risk classification of a project.** In determining the SEA/SH risk classification of a project, task teams, including SD Specialists, also need to consider other resources and information, for example, particular project-related risks, client/country capacity constraints and track record, or regional variations not fully captured by the Tool. The SD Specialist proposes the SEA/SH risk rating of the project based on the output of the Tool and other information, and the rating is finalized by the SD Specialist in agreement with the TTL.⁵ The risk rating is recorded in the concept and appraisal ESRs, and the TTL advises the Borrower.
37. **Once the SEA/SH risk rating is determined, the task team can assist the Borrower in developing and incorporating the necessary mitigation measures into project design and documentation.** SD Specialists and GBV focal points in the region provide necessary support to the HD task team. A roster of short-term [consultants](#) specializing in SEA/SH assessment and mitigation in projects is also available to the task team, should the need for such a dedicated resource arise. Annex 5 provides a snapshot of the steps that the TTL, SD Specialist and others should take at various stages of the project cycle to screen for and mitigate SEA/SH risks. Section 5 also summarizes recommended mitigation measures for HD Operations based on SEA/SH risk rating.
38. **The SEA/SH risk rating helps inform the social risk rating of the project.** The social risk rating, along with the environmental risk rating, then determines a project’s overall Environmental and Social Risk Classification (ESRC). There is no set formula for how the SEA/SH risk rating influences the social risk rating. The task team and the SD Specialist must consider the specific characteristics and risks of the project. Should there be a large gap between the two ratings—for example, if the SEA/SH risk rating is substantial and the social risk rating is low—a clear rationale needs to be provided.

SEA/SH Risk Screening Tool

39. **The SEA/SH Risk Screening Tool was developed by the Bank to help task teams identify the issues and risks of SEA/SH in Bank projects.** The Tool enables task teams to analyze SEA/SH risks iteratively throughout the project life cycle, starting with preparation, and recognizing the potential for increased risk of SEA/SH as a result of the project. The Tool was originally developed to apply to projects involving major civil works and has now been expanded to include HD Operations that comprise activities relating to Education,

⁴ For example, a project that, at the time of project preparation, does not have CoC in place, should not rate the question low on the basis of future implementation of a CoC. However, a follow-on project could rate the question low since the CoC would already be in place.

⁵ The internal accountability and decision-making framework (ADM) for the project SEA/SH risk rating follows the ADM roles for the overall project ESRC. In the case of disagreement about the project SEA/SH risk rating, the Chief Environmental and Social Standards Officer makes the final determination in consultation with the RSA, following the ADM for the overall ESRC (see *E&S Directive*, Section III, B.2.b).

Social Protection, Jobs, Health, Nutrition and Population. The Tool for each sector can be accessed [here](#).⁶

40. The Tool consists of two categories of questions that are used to assess the level of SEA/SH risk:

- **National context** – 13 questions are related to the national context in which the project will be implemented. These questions are the same for every sector. In most cases, the necessary information on the national prevalence of GBV is publicly available⁷ and answers to these questions are pre-populated in the online Tool. The Bank’s Gender team maintains the data for these questions and updates the data every two years.⁸
- **Project-specific-risks** – 12 questions are used to screen project-specific risks, both contextual and potentially generated by the project. These questions vary by sector; examples are listed in Annex 1 and discussed in more detail in Annexes 2-4.

41. The Tool calculates a composite SEA/SH risk score for a project based on the responses to these questions.⁹ Each sector has its own corresponding risk rating cut-off points (i.e., the score that corresponds to High, Substantial, Moderate or Low risk of SEA/SH). Based on the SEA/SH risk rating, there are recommended minimum mitigation measures to be discussed with the Borrower. The SEA/SH risk rating produced by the Tool should be considered as a *starting point* for determining the SEA/SH risk classification of a project. Annex 1 includes further information on completing and using the Tool. Where projects include multiple components with different sector-based risk screening tools, task teams should assess each component with its respective tool and consider the ratings from each as a guide to a consolidated SEA/SH risk rating for the overall project. For regional projects, the country with the highest level of SEA/SH risk should be reflected in the overall SEA/SH risk rating and in the Project Appraisal Document (PAD).

Borrower Responsibility to Assess SEA/SH Risk

42. Borrower responsibilities in relation to assessing SEA/SH risk derive from the ESF. ESS1 requires Borrowers to conduct an ESA, taking into account all relevant E&S risks and impacts of the project, including social risks and impacts, such as threats to human security through the escalation of personal or communal violence.¹⁰ The Borrower’s assessment must be proportionate to the level of E&S risks and impacts.¹¹ Important considerations for collecting information about SEA/SH are set out in Annex 6.

43. In a project with higher SEA/SH risk, the Borrower may be required to engage GBV specialists to support its assessment. Under the Bank’s E&S Policy, the Bank may

⁶ While the questions the Tool uses are outlined in this GPN, the SEA/SH Risk Screening Tool can only be accessed by Bank staff/consultants on the World Bank network (use FURL seahscreen/).

⁷ For example, in DHS, <https://www.dhsprogram.com/data/>

⁸ The SEA/SH Risk Screening Tool considers country-level data as a starting point. The task team may wish to adjust ratings based on state-level data, where this is available.

⁹ Note that for regional projects, the SEA/SH Risk Screening Tool will need to be filled for each country.

¹⁰ ESS1, paragraph 28(b)(i).

¹¹ ESS1, paragraph 3.

determine whether a Borrower is required to retain independent third-party specialists to assist in the assessment of E&S impacts, depending on the potential significance of the risks.¹² ESS1 requires the Borrower to retain independent specialists to carry out the E&S assessment in all projects with an overall E&S risk rating of *High* or *Substantial*, or in cases where the Borrower has limited capacity.¹³ In HD Operations with an SEA/SH risk rating of *High* or *Substantial*, it is recommended that the Bank task team require the Borrower to retain a GBV specialist in the implementing agency as early as possible, to support the risk assessment and development and rollout of mitigation measures.¹⁴

44. **The ESSs includes a range of Borrower requirements that are relevant to assessing and mitigating SEA/SH risk.** Table 3 summarizes provisions in the ESSs that are particularly relevant to assessing and mitigating SEA/SH risks and represent key “points of entry.” Since discrimination can be a starting point for, and exacerbate, SEA/SH, relevant gender discrimination provisions in the ESSs are included.

Table 3: ESS Requirements for the Borrower Relevant to SEA/SH Risks and Impacts
ESS1. Assessment and Management of Environmental and Social Risks and Impacts
<ul style="list-style-type: none"> • Assess threats to human security through the escalation of personal, communal or inter-state conflict, crime or violence (ESS1 paragraph 28(b)(i)). This is a major overarching provision in the ESF relating to social risks and impacts, addressing all forms of GBV and SEA/SH, threatened or actual. • Assess risks and impacts that project impacts fall disproportionately on the disadvantaged or vulnerable and any prejudice or discrimination toward such groups in providing access to development resources and project benefits. (ESS1 paragraph 28(b)(ii) and (iii)). Note, since discrimination can be a starting point for, and exacerbate SEA/SH, relevant discrimination provisions in ESS1 and elsewhere in the ESSs are included in this table. This may include inequities based on gender. • Apply the mitigation hierarchy to risks of SEA/SH (ESS1, paragraph 27). Note: while the word “prevention” is not used in paragraph 27, the first action, “anticipate and avoid,” constitutes the highest level of protection, with subsequent measures for mitigating any residual risks. • Implement differentiated measures so that adverse impacts do not fall disproportionately on the disadvantaged or vulnerable, and they are not disadvantaged in sharing any development benefits and opportunities resulting from the project (ESS1, paragraph 29). • Ensure that projects do not inadvertently compromise existing legitimate rights for land and natural resource tenure and use (including collective rights, subsidiary rights, and the rights of women) or have other unintended consequences, particularly where the project supports land titling and related issues (ESS1, footnote 29).
ESS2. Labor and Working Conditions
<ul style="list-style-type: none"> • Apply the principle of equal opportunity and fair treatment in the employment of project workers, so that there will be no discrimination with respect to any aspects of the employment relationship (ESS2 paragraph 13).

¹² ES Policy, paragraph 35.

¹³ ESS1, paragraph 25.

¹⁴ Bank task teams may reach out to their GBV focal point for sample terms of reference for a GBV Specialist.

- Provide appropriate measures of protection and assistance to address the vulnerabilities of project workers, including specific groups of workers, such as **women**, people with disabilities, migrant workers, and children (of working age, in accordance with ESS2) (ESS2, paragraph 15).
- Do not employ trafficked persons in connection with the project. **Women and children** are particularly vulnerable to trafficking practices, including coercion and violence (ESS2, paragraph 20 and footnote 15).
- Provide a grievance mechanism to direct and contracted workers for workplace concerns (ESS2, paragraph 21).
- OHS provisions, together with application of the World Bank Environmental, Health, and Safety Guidelines, may have direct relevance for SEA/SH risks in the workplace.

ESS4. Community Health and Safety

- Evaluate and address the risks and impacts of the project on the health and safety of the affected communities during the project life cycle, including **the vulnerable** (ESS4, paragraph 5).
- Avoid or minimize the potential for community exposure to water-borne, water-based, water-related, and vector-borne diseases, and communicable and non-communicable diseases (including sexually transmitted diseases) that could result from project activities, taking into consideration differentiated exposure to and higher sensitivity of **vulnerable groups** (ESS4, paragraph 15).
- Applying the concept of universal access in environmental design may increase safety and security for project actors and beneficiaries (ESS4, paras 7 and 9).
- Avoid or minimize transmission of communicable diseases associated with influx of temporary or permanent project labor (ESS4, paragraph 16, ESS4, GN5.3).

ESS5. Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

- Since property disputes can be a source of coercion or violence, ensure in the consultation process that **women’s perspectives are obtained, and their interests factored into all aspects of resettlement planning and implementation** (ESS5, paragraph 18).
- Issue documentation of ownership or occupancy and compensation payments in the names of **both spouses** or single heads of households as relevant; other resettlement assistance, such as skills training, access to credit, and job opportunities, should be equally available to **women** and adapted to their needs, including by addressing the potential for backlash against women and girls (ESS5, footnote 18).
- Establish in the resettlement action plan the entitlements of affected persons and/or communities, paying particular attention to **gender** aspects and the needs of vulnerable segments of communities, and ensure that these are provided in a transparent, consistent, and equitable manner (ESS5, paragraph 33).

ESS7. Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

- Proactively engage with relevant Indigenous Peoples to ensure their ownership and participation in project design, implementation, monitoring and evaluation, and consult with them as to the cultural appropriateness of proposed services or facilities. Seek to identify and address any economic or social constraints (including those relating to **gender**) that may limit opportunities to benefit from, or participate in, the project (this would include violence or threats of violence) (ESS7 paragraph 14).
- Conduct the engagement process, which includes stakeholder analysis and engagement planning, disclosure of information, and meaningful consultation, in a culturally appropriate and **gender** and intergenerationally inclusive manner (ESS7, paragraph 23).
- Assess and document Indigenous Peoples’ resource use without prejudicing any Indigenous Peoples’ land claim, and ensure that the assessment of land and natural resource use is **gender**

inclusive and specifically consider women’s role in the management and use of these resources (ESS7, paragraph 30(d)).

- Address the **gender** and intergenerational issues that exist among Indigenous Peoples through technical or financial support (ESS7, paragraph 35).

ESS10. Stakeholder Engagement and Information Disclosure

- Identify **the disadvantaged or vulnerable** (ESS10, paragraph 11).
- Describe in the Stakeholder Engagement Plan (SEP) the measures that will be used to remove obstacles to participation, and how the views of differently affected groups will be captured. Where applicable, the SEP will include differentiated measures to allow the effective participation of **the disadvantaged or vulnerable, including opportunities for women to participate free from coercion or violence** (ESS10, paragraph 16).
- Provide stakeholders with access to information on potential risks and impacts that might disproportionately affect **the vulnerable and disadvantaged** and describe the differentiated measures taken to avoid and minimize these (ESS10, paragraph 19 (c))
- Disclose information in relevant local languages and in a manner that is accessible and culturally appropriate, taking into account any specific needs of groups that may be differentially or disproportionately affected by the project, or groups of the population with specific information needs (such as, disability, literacy, **gender**, mobility, differences in language or accessibility) (ESS10, paragraph 20).
- Provide a grievance mechanism for project-affected parties without cost or retribution, and allow grievances to be submitted anonymously (ESS10, paras 26-27).

5. SEA/SH Mitigation Measures for HD Operations

Bank and Borrower Responsibilities on SEA/SH Risk Mitigation

45. **As set out in ESS1, the Borrower’s E&S assessment informs the design of the project and is used to identify mitigation measures and actions.**¹ These measures and actions should be consistent with the mitigation hierarchy to anticipate and avoid risks and impacts, and to take steps to reduce and mitigate risks and impacts where avoidance is not possible.² Some key mitigation measures are detailed in this section.
46. **Bank task teams assist the Borrower in identifying appropriate tools to manage project SEA/SH risks, in light of the nature and scale of the project and its context.**³ A summary of the task team’s responsibilities regarding SEA/SH risk mitigation throughout the project cycle is summarized in Box 5 below and set out in Annex 5. Based on the Borrower’s E&S assessment and the Bank’s own due diligence, the Bank must agree with the Borrower on the conditions for Bank support to the project. These commitments are set out in the ESCP as key measures and actions needed for the project to meet the ESSs in a specified timeframe.⁴
47. **Mitigation measures and their timing are clearly presented in project documents.**⁵ The timing of mitigation measures is agreed between the Bank’s task team and the Borrower’s project team (PIU) and set out in the ESCP. Appropriate mitigation measures need to be in place before certain project actions can proceed – the Borrower must not carry out activities that may cause material adverse E&S risks or impacts until the relevant plans, measures, or actions have been completed in accordance with the ESCP.⁶ If the project includes existing activities or facilities that do not meet the ESS requirements at the time of Board approval, the Borrower and the Bank will agree actions to bring them in line with the ESS in a timeframe that is satisfactory to the Bank, and record these in the ESCP.⁷ Borrowers and Bank task teams should consider how such actions will be resourced prior to project effectiveness and, for projects with High or

¹ ESS1, paragraph 3.

² ESS1, Objectives and paragraph 27. Technical feasibility is based on whether the proposed measures and actions can be implemented with commercially available skills, equipment, and materials, taking into consideration prevailing local factors such as climate, geography, demography, infrastructure, security, governance, capacity, and operational reliability. Financial feasibility is based on relevant financial considerations, including relative magnitude of the incremental cost of adopting such measures and actions compared to the project’s investment, operating, and maintenance costs, and on whether this incremental cost could make the project nonviable for the Borrower.

³ ES Policy, paragraph 3.

⁴ ES Policy, paragraphs 3 and 46.

⁵ See for example Annex 7 (pp. 123-125) of the Project Appraisal Document (PAD) for the Nigeria Adolescent Girls Initiative for Learning and Empowerment Project (P170664), available at: <https://documents1.worldbank.org/curated/en/613581596247523870/pdf/Nigeria-Adolescent-Girls-Initiative-for-Learning-and-Empowerment-Project.pdf>

⁶ As per ES Policy, paragraph 17, and ESS1, paragraph 16.

⁷ As per ES Policy paragraph 18 and ESS1, paragraph 17.

Substantial SEA/SH risk rating, ensure that GBV specialists are engaged in the PIU as early as possible during preparation.

48. **During implementation, both the Borrower and the Bank monitor the project's E&S performance.** The Borrower must monitor the project and identify any changes that result in additional risks or impacts. The Borrower must update the ESCP and/or the relevant E&S management tools to incorporate necessary corrective and preventive actions. The Bank task team should ensure that the Borrower adequately implements, monitors and revises SEA/SH risk mitigation measures, as agreed in the ESCP. The task team highlights relevant issues in ISRs and factors in changes in SEA/SH risk levels in the social risk section of the ISRs.

Box 5. Documenting SEA/SH Mitigation Measures Throughout the Project

During project preparation

- At the **project concept stage**, the initial SEA/SH risk rating should be recorded in the ESRS. The task team should review the Borrower's plans and timeline to assess SEA/SH risks and implement risk mitigation measures. Client capacity to address SEA/SH risks should be assessed and plans to mobilize expertise should be discussed. The mitigation measures should be included in the appropriate project documents and related terms of reference (TOR), including the SEP, draft Environmental and Social Management Plan/Environmental and Social Management Framework (ESMP/ESMF), draft ESCP, etc.
- Prior to the **project decision meeting/project appraisal**, the risk rating should be reassessed, and this should be included in the Appraisal ESRS. The PAD prepared for the decision meeting package should: (i) include the agreed SEA/SH risk rating; (ii) highlight the main identified risks related to SEA/SH; and (iii) describe the proposed mitigation measures, proportionate to the risk. Mitigation measures, with associated budget and timelines, are included in the ESCP (which is included in the appraisal package as part of the legal agreement) and incorporated in the Borrowers' E&S management instruments.
- By **project negotiations**, the mitigation measures and their timing for delivery/implementation should be agreed with the client, finalized, and where necessary spelt out in the ESCP along with resourcing.
- Where mitigation actions are agreed to be fulfilled at any point **after project appraisal** (for example, by effectiveness or within a timeframe during implementation), these actions are stipulated in the legal agreement, including in the ESCP.

During project implementation

- The task team's implementation support should ensure that the agreed mitigation measures are adequately implemented prior to the relevant activities commencing, and are monitored. The task team highlights progress in the ISRs.
- The task team monitors functioning of the project grievance mechanism throughout implementation.

- Allegations of SEA/SH received during project implementation should be reported by the Borrower to the task team, and the task team should report basic information to management in accordance with SEA/SH provisions in the Environmental and Social Incident Response Toolkit (ESIRT).^a

^a World Bank. 2020. *ESF Good Practice Note (GPN) on Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing Involving Major Civil Works*. 2nd ed. Washington, DC: International Bank for Reconstruction and Development/World Bank. Available at: <https://thedocs.worldbank.org/en/doc/632511583165318586-0290022020/original/ESFGPNSEASHinmajorcivilworks.pdf> See Chapter 5 on Responding to SEA/SH allegations. See also: [ESIRT](#) (November 2018).

Working with Implementing Partners and Contractors to Mitigate SEA/SH

49. **In addition to the Bank and the Borrower, implementing partners, such as contractors, consultants, nongovernmental organizations (NGOs), and UN Agencies, have an important role in mitigating SEA/SH.** The ESF recognizes that Borrowers work with a range of agents, advisers, consultants, and contractors to implement Bank-supported projects. While the Borrower maintains primary responsibility to meet the requirements of the ESF, it often needs to rely on those partners to carry out project activities, to monitor and report, and to engage with project-affected people. Borrowers should consider how SEA/SH mitigation measures will be incorporated into their engagements with implementing partners.⁸ Bank standard procurement documents and standard bidding documents incorporate a range of measures to address SEA/SH, which Borrowers agree to apply for international competitive procurement.⁹ More generally, Annex 3 of ESS1 specifies that the Borrower will require that all contractors engaged on the project operate in a manner consistent with the requirements of the ESSs, including the specific requirements set out in the project ESCP.¹⁰ Borrowers are required to manage their contractors in an effective manner, including by ascertaining that the contractors have adequate knowledge and skills to perform their tasks, incorporating relevant E&S commitments into their contracts, and monitoring their compliance (see Box 6).

50. **UN Agencies play key roles as implementing partners in Bank-financed projects across a range of activities.** In some cases, Borrowers may engage a UN Agency to implement one aspect of a project or to provide specific technical advice or services. In other cases, the UN Agency may receive financing directly from the World Bank and act in the place

⁸ In relation to private sector partners, good practice examples are set out in Social Development Direct. 2020. *Addressing Gender-Based Violence and Harassment: Emerging Good Practice for the Private Sector*. International Finance Corporation, European Bank for Reconstruction and Development and CDC Group. Washington, DC: IFC. Available at https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/publications/publications_gpn_addressinggbvh, and relevant Sector Briefs, each available at <http://www.ifc.org/addressinggbvh>

⁹ Relevant procurement and bidding requirements are discussed in further detail in the [Civil Works GPN](#), paragraph 67 and following.

¹⁰ ESS1, Annex 3, “Management of Contractors.”

of the PIU to implement a Bank-supported project. Engagements with UN Agencies are subject to the same ESF requirements as other IPF projects, and generally are governed by standard form agreements – many of which reference SEA/SH considerations specifically. Many UN Agencies also have policies and procedures related to SEA/SH mitigation and response which apply to their staff and consultants. When an HD Operation engages a UN Agency, Bank task teams should contact the OPCS UN Program team early in the preparation stage for further guidance on incorporating SEA/SH considerations into the contract and work plan.

Box 6. ESS1—Annex 3. Management of Contractors

The Borrower will require that all contractors engaged on the project operate in a manner consistent with the requirements of the ESSs, including the specific requirements set out in the ESCP. The Borrower will manage all contractors in an effective manner, including:

- Assessing the E&S risks and impacts associated with such contracts;
- Ascertaining that contractors engaged in connection with the project are legitimate and reliable enterprises, and have knowledge and skills to perform their project tasks in accordance with their contractual commitments;
- Incorporating all relevant aspects of the ESCP into tender documents;
- Contractually requiring contractors to apply the relevant aspects of the ESCP and the relevant management tools, and including appropriate and effective non-compliance remedies;
- Monitoring contractor compliance with their contractual commitments; and
- In the case of subcontracting, requiring contractors to have equivalent arrangements with their subcontractors.

Key Mitigation Measures for SEA/SH in HD Operations

51. **This section of the GPN elaborates on a range of potential mitigation measures for SEA/SH risk that may be appropriate to different types of HD Operations with different levels of risk.** The actions described in this section should provide a starting point for Bank task teams to consider appropriate mitigation – they are not a comprehensive list and will be updated to represent emerging good practice. Decisions about necessary actions should be informed by the project context and design and SEA/SH risk. Project task teams should keep in mind that ESS1 requires Borrowers to utilize “means that are appropriate to the nature and scale of the project and proportionate to the level of...risk” (ESS1, paragraph 2). Table 4 summarizes the minimum recommended mitigation measures for projects at each SEA/SH risk rating:

Table 4: Minimum Recommended Mitigation Measures According to SEA/SH Risk Rating (paragraph references are to the present document)	
Project SEA/SH Risk Rating	Minimum recommended mitigation measures
Low or Moderate	<ul style="list-style-type: none"> • Accountability and Response Framework (paragraph 54) • Grievance mechanism (paragraph 67) • Prohibitions on SEA/SH for each project actor (defined in paragraph 17), in the form of <i>either</i>: <ul style="list-style-type: none"> ○ Behavioral Standards with general misconduct and harassment prohibitions (paragraph 62); <i>or</i> ○ Codes of Conduct (paragraph 64) • Sensitization (paragraph 66) • Identification of a quality GBV service provider that is accessible to complainants in the project area (paragraph 73)
Substantial or High <i>Bold items indicate measures that are different or additional to those recommended for projects with low or moderate SEA/SH risk rating</i>	<ul style="list-style-type: none"> • Borrower to retain GBV specialist in the implementing agency (paragraph 43) • SEA/SH Action Plan (paragraph 53) • Accountability and Response Framework (paragraph 54) • Grievance mechanism (paragraph 67) • Prohibitions on SEA/SH for each project actor (defined at paragraph 17), in the form of <i>either</i>: <ul style="list-style-type: none"> ○ Behavioral Standards with explicit SEA/SH prohibition (paragraph 63); <i>or</i> ○ Codes of Conduct (paragraph 64) • Sensitization and training (paragraph 66) • Identification or mapping of one or more quality GBV service providers that are accessible to complainants in the project area (paragraph 73)

52. **Several of the potential mitigation measures described below work together to reduce the risk of SEA/SH and to provide support for survivors after an incident has occurred.** Many of them can also be adapted to suit the project context, risk level, scale, and modalities, as well as the capacity of the Borrower. Some actions may require greater engagement of Bank task teams and specialists, and some may require the Borrower to engage specialists to support implementation. The key mitigation measures detailed in this section include:

- SEA/SH Action Plan
- Accountability and Response Framework
- Behavioral Standards, Codes of Conduct and Disciplinary Measures
- Training and Sensitization
- Grievance Mechanisms and Referrals
- GBV Service Provider Identification and Mapping
- Recruitment of Staff Engaging Closely with Children
- Creating Safe Spaces at the Facility-level.

The SEA/SH Action Plan

53. **For projects with a substantial or high level of SEA/SH risk, it is recommended that the Borrower prepare a dedicated SEA/SH Action Plan.** The SEA/SH Action Plan acts as a roadmap to capture the approach to assess, mitigate, and monitor project SEA/SH risks. It is prepared by the Borrower, usually with support from the Bank task team and GBV specialists. The document may form part of a broader ESMF or ESMP, or it may be developed and disclosed separately. The process of preparing the Action Plan helps Borrowers to think through each component of the project, the relevant risks and impacts, appropriate mitigation actions and their resourcing. A sample of an SEA/SH Action Plan is set out in Annex 7. The Action Plan includes specific arrangements for the project to address SEA/SH risks, along with their timing, parties responsible, and the budget, such as:

- How the project will identify or map the GBV service providers to which SEA/SH survivors will be referred, and the services that will be available;
- How the project will provide information to project actors and the community on reporting SEA/SH incidents to the grievance mechanism;
- Arrangements to develop the Accountability and Response Framework;
- An awareness-raising strategy, information dissemination, reporting protocols, and referral protocols;
- Arrangements to implement and monitor mitigation actions.

Further details on the scope and purpose of an SEA/SH Action Plan are set out in the Civil Works GPN.¹¹

The Accountability and Response Framework

54. **Borrowers should ensure that all projects have in place an Accountability and Response Framework, which consists of procedures that detail how to respond to allegations of**

¹¹ See paragraphs 56-57 of the [Civil Works GPN](#)

SEA/SH. Because SEA/SH allegations can arise in any Bank-supported project, all Borrowers should ensure they have in place procedures and measures to deal with such allegations in a safe, timely, and ethical manner. These procedures are documented in an Accountability and Response Framework, which details how SEA/SH allegations are handled and how disciplinary actions are determined for project actors who violate the Behavioral Standards or CoC.¹² The framework sets out the process for verification of allegations by trained staff, in a manner consistent with the survivor-centered approach (see Box 7 below). It should be developed by the implementing agency and required of contractors and should be included in the project’s operation manual. The framework should follow the requirements of local labor legislation, industrial agreements, and mandatory reporting requirements for SEA/SH incidents for adults and children. A sample of an Accountability and Response Framework is set out in Annex 8. Further details on the management and resolution of allegations are provided in the Civil Works GPN.¹³

55. An Accountability and Response Framework documents, in a single place, how allegations of SEA/SH will be handled, along with the disciplinary action for violations by project actors. It should include, at a minimum:

- Steps for handling and reviewing allegations, including timeframe, and responsibilities for each stage of the process.
- Procedures for review of complaints or incident reports, including information on the investigation and verification process.
- Confidentiality requirements for dealing with cases (e.g., consent and information sharing protocols).
- Internal reporting of allegations, for case accountability. This should include the GM process for capturing disclosure of SEA/SH.
- Protocols for responding to survivors, using the survivor-centered approach (see Box 7), and including a pathway to refer survivors to appropriate support services where they exist (see paragraph 70).
- Specific protocols to address allegations involving children, incorporating consideration of the best interests of the child, specialist support services, and the role of parents/guardians in the response process (see Box 3 above).
- Mandatory reporting requirements, if applicable under national law, including the need to inform survivors (ideally prior to disclosure) of this obligation and any limits on confidentiality.
- Disciplinary measures against project actors who commit SEA/SH, including the range of possible disciplinary measures for violation of any CoC or Behavioral Standards (see paragraph 65).

¹² See paragraphs 57-59 of the [Civil Works GPN](#)

¹³ See paragraphs 117-118 of the [Civil Works GPN](#)

- Protocols for protection of whistleblowers and prohibition on retaliation against both complainants and whistleblowers, consistent with the World Bank's Commitments on Reprisals.¹⁴

56. **Some Borrowers and implementing agencies may already have procedures on complaint handling or guidelines to address worker misconduct.** Borrowers should review these existing procedures and structures and consider if they should be adapted or enhanced to form an adequate Accountability and Response Framework. Bank task teams and legal staff can provide support as needed.

Box 7. Applying a Survivor-centered Approach When Responding to SEA/SH

Notwithstanding all reasonable efforts to avoid the occurrence of SEA/SH, Borrowers must be prepared to respond to complaints or reports of SEA/SH in their projects. Borrowers must ensure safe, timely, and ethical responses to SEA/SH allegations, following a survivor-centered approach.

This approach recognizes that an appropriate response to a survivor's complaint must respect the survivor's choices. This means that the survivor's rights, needs, and wishes are prioritized in every decision related to the incident. The response should minimize further harm to the survivor and promote their well-being and should take appropriate steps to address the perpetrator's actions.

The survivor of SEA/SH who has the courage to come forward must always be treated with dignity and respect. Every effort should be made to protect the safety, confidentiality, and well-being of the survivor and any action should always be taken with the survivor's consent. In relation to incidents of SEA/SH involving children, the child's wishes and opinions on their situation should be considered in determining the best interests of the child.^a

These steps serve to minimize the potential for re-traumatization and further violence against the survivor, their family, and anyone reporting SEA/SH.

^a For specific guidance on children's participation in decision-making by age group, see IRC, *Caring for Child Survivors of Sexual Abuse Guidelines, Case Management for Child Survivors*, p. 102.

¹⁴ See World Bank. March 2020. "World Bank Commitments Against Reprisals." <https://www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/world-bank-commitments-against-reprisals>

Box 8. Mandatory Reporting Requirements Related to SEA/SH Incidents

Some countries or states have legislation that requires individuals or designated individuals (such as health care providers) to report incidents of actual or suspected sexual violence to the police or legal system. In many countries, mandatory reporting relates primarily to abuse of children and maltreatment of minors, but in others it has been extended to the reporting of intimate partner violence.^a

The Borrower, implementing agencies, and GBV service providers should be aware of any legal obligations to refer SEA/SH incidents for criminal prosecution. These requirements may differ depending on the country, legal context, and institution. The World Health Organization (WHO) does not recommend mandatory reporting of intimate partner violence to the police, because it can impinge on women’s autonomy and decision-making.^b However, where national law requires the referral of an allegation of SEA/SH, the Bank will require the Borrower to ensure that those requirements are followed. Reporting should be done in accordance with the law, especially in cases that require mandatory reporting of certain types of SEA/SH allegations, such as sexual abuse of a minor.

When a survivor comes forward to report a complaint about SEA/SH to the project Grievance Mechanism, the survivor should first be made aware of any obligations under national law to report certain incidents, consistent with the principle of consent. When there is no legal obligation to report the case according to national law, survivors make the decision of whether to report cases to the authorities and to other service providers; reporting to the police should be done exclusively with the survivor’s consent.

^a World Health Organization, 2013: *Responding to intimate partner violence and sexual violence against women: WHO clinical and policy guidelines*, p. vii, available at: https://apps.who.int/iris/bitstream/handle/10665/85240/9789241548595_eng.pdf

^b For further information and a summary of relevant research, see WHO, 2013, p. 9 and p. 41.

Behavioral Standards, Codes of Conduct, and Disciplinary Measures

57. **Mechanisms to sensitize people about SEA/SH and to hold them accountable for their actions are important to mitigate SEA/SH risks.** This GPN focuses on two methods for implementing SEA/SH prohibitions – CoC and Behavioral Standards (see Glossary). Both are written sets of principles or minimum standards of behavior. In this GPN, Behavioral Standards refer to requirements that may be pre-existing and apply as a condition of the person’s employment or professional membership, while CoC refers to commitments that are agreed to specifically in relation to a Bank-financed project. Both methods provide a basis for the Borrower or its contractors to implement disciplinary measures against a project actor who perpetrates SEA/SH.
58. **The Bank’s approach to CoC and Behavioral Standards follows the ESF requirements.** ESS4 requires Borrowers to mitigate community health and safety risks and to establish management systems that address the safety of services provided to the community and

the risks of exploitation.¹⁵ ESS2 requires Borrowers to develop and implement labor management procedures that set out how project workers will be managed, including measures to prevent and address harassment,¹⁶ and measures to address risks that may arise from interaction between project workers and local communities.¹⁷ This may include measures to raise awareness of risks and to communicate expectations regarding appropriate conduct, together with disciplinary measures and legal, contractual, or organizational arrangements to address SEA/SH risks. OHS measures take into account risks posed to both project workers and civil servants working in connection with a project, including risks of SEA/SH.

59. **In order to mitigate and respond to incidents of SEA/SH in Bank-financed projects effectively, prohibitions on SEA/SH need to be clear, mandatory, and enforceable.** The Borrower should consider how best to ensure that project actors understand the standards of behavior expected of them with respect to SEA/SH; have made a commitment to not violate these standards; and understand the consequences for violating those commitments. Given the diverse activities and structures in HD Operations, various types of project actors need to be considered: (a) project workers that may include PIU staff, private sector contractors, and community volunteers; and (b) civil servants working in connection with the project, including teachers and health care workers (see Table 1 above). These actors are identified as part of the project risk assessment and when developing the labor management procedures, in accordance with ESS2.¹⁸ In some circumstances, Borrowers may identify risks of SEA/SH being perpetrated by other individuals who are not project actors. On a case-by-case basis, Borrowers may consider extending CoC to others who have a role in achieving the project objectives.

When are Behavioral Standards sufficient?

60. **Some project actors in HD Operations—especially civil servants—carry out activities related to the project as part of their existing employment. In these cases, prohibitions on SEA/SH may be implemented through existing institutional Behavioral Standards with which they have agreed to comply as a condition of their employment.** Behavioral Standards may be found in employment agreements, regulatory frameworks, or civil service codes of conduct. Civil servants working in connection with the project, for example, teachers or healthcare providers involved in training activities, usually remain subject to the terms and conditions of their existing public sector employment agreement or arrangement.¹⁹ These employment agreements or the Borrower's regulatory framework may already contain requirements defining acceptable behavior for civil servants. For example, a general civil service code of conduct may prohibit

¹⁵ ESS4, paragraphs 5 and 9, ESS4 Guidance Note GN 5.3 and 9.1.

¹⁶ ESS2, paragraph 13.

¹⁷ ESS2, GN 9.4.

¹⁸ ESS2, paragraph 9, GN 9.1 and GN 9.4.

¹⁹ See ESS2, paragraph 8 and GN 8.1, 8.2 and 8.3.

harassment or abuse of power. Bank task teams and Borrowers consider existing Behavioral Standards and consequences for violations as part of their risk screening.²⁰

61. **Behavioral Standards are supported by sensitization efforts about SEA/SH. Depending on the project SEA/SH risk rating, they may need to be supplemented with a CoC or amended to explicitly prohibit SEA/SH.** The Borrower conducts an initial analysis of any existing Behavioral Standards and considers the enforceability of SEA/SH prohibitions in such Behavioral Standards in light of the relevant jurisdiction and project context. The Bank task team then conducts its own due diligence of the adequacy of the Behavioral Standards proposed to be used, to consider whether they are clear, mandatory, and enforceable. This includes analysis of local employment laws, collective bargaining agreements, and whether there is a need for individual signature for a prohibition to become binding. When Behavioral Standards do not satisfy the criteria, they are either amended or supplemented with a project-specific CoC, sensitization efforts, and updates to the disciplinary framework as outlined in paragraphs 62-65 below. The decision on whether it is acceptable to use Behavioral Standards is made at Appraisal, with the clearance of the Regional Environmental and Social Standards Advisor (RSA) and E&S Practice Manager, as appropriate, and is reflected in the ESRS and the ESCP.

Behavioral Standards in Low and Moderate SEA/SH Risk Projects

62. **For projects with a low or moderate SEA/SH Risk Rating, existing Behavioral Standards that include general prohibitions against misconduct, harassment, and criminal actions may provide an avenue for accountability in the case of an incident.** General Behavioral Standards should be supported with SEA/SH sensitization efforts, including information and awareness campaigns and dedicated training. Project actors who are subject to the Behavioral Standards must receive clear information about what constitutes SEA/SH and be informed that SEA/SH will be treated as misconduct under the Behavioral Standards. Bank task teams are strongly encouraged to work with PIUs to review labor contracts for government civil servants and adopt strengthened Behavioral Standards when possible. If strengthening of the Behavioral Standards is not possible, project actors will need to agree to a project-specific CoC (see paragraph 64).

Behavioral Standards in Substantial and High SEA/SH Risk Projects

63. **In projects with a substantial or high SEA/SH risk rating, Behavioral Standards or a CoC that explicitly prohibits SEA/SH are recommended.** Explicit provisions that prohibit and define SEA/SH in line with international standards, including a prohibition on sexual activity with anyone under the age of 18, and define mandatory consequences elevate awareness of SEA/SH risks and provide a clear path of accountability for violations.²¹

²⁰ See Project-level Risk Screening Questions in Annexes 2-4: Health (Question 10), Education (10), and Social Protection and Jobs (11-12).

²¹ As noted in Section 3 above, the World Bank considers children as anyone under the age of 18— even if national law may have a lower age—and, as such, not able to give free and voluntary consent. The age of consent has important implications for project actors engaged on World Bank-financed projects. If a project actor is married to someone under the age of 18 and that marriage is recognized by a public, religious, or customary authority and

Where Behavioral Standards do not explicitly prohibit SEA/SH, Bank task teams should engage Borrowers in dialogue as early as possible during project preparation to determine whether the Borrower will introduce specific SEA/SH prohibitions into the Behavioral Standards or will adopt a project-specific CoC. Borrowers will introduce explicit SEA/SH prohibitions in contractually binding instruments before project actors begin activities in connection with the project. Depending on the nature and scale of the project, this may require engagement with other Government ministries and agencies, as well as stakeholders such as worker organizations. The Borrower and Bank should agree to specific actions the Borrower will take to develop and implement the SEA/SH prohibitions, with responsibilities and timeframes, to be reflected in the SEA/SH Action Plan and included in the ESCP.

When are Codes of Conduct needed?

64. **When project actors are not covered by Behavioral Standards, the Borrower will ensure that they agree to comply with a project-specific CoC that includes explicit prohibitions on SEA/SH.** This measure is relevant for projects at all levels of SEA/SH risk ratings. The CoC is a written document that sets out core principles and minimum standards of behavior with which the project actors agree to comply on an individual basis and may be specific to the Bank-financed Project. Project actors acknowledge that violation of the CoC may result in disciplinary action by the employer and may affect their ongoing employment on the project. The time needed for the Borrower to roll out a CoC in projects with low or moderate SEA/SH risk ratings will be agreed between the Borrower and the Bank, consistent with the ESF, taking into account the project risk and activities. The Bank has developed a range of sample CoCs through its operational work, in particular relating to contractors engaged in Civil Works. Bank standard procurement documents, which Borrowers agree to use for international competitive procurement, incorporate the CoC among a range of measures to address SEA/SH.²² All project actors engaged through contracts or consultancies should be appropriately sensitized by the Borrower to ensure they understand and agree to the prohibitions on SEA/SH.

How are disciplinary measures determined?

65. **The Borrower should ensure that employers have a clear process to determine and implement disciplinary sanctions in line with the CoC or Behavioral Standards and as stipulated in the Accountability and Response Framework.** Some SEA/SH allegations may be referred to local or national authorities for the purposes of criminal investigation, in accordance with the wishes of the survivor or in compliance with mandatory reporting requirements in the relevant jurisdiction. As a separate matter, disciplinary sanctions for violation of a CoC or Behavioral Standards should form part of a process that is internal

consistent with the legal age for marriage in the country, such underage marriage shall not constitute a reason not to engage the project actor. CoCs or Behavioral Standards shall prohibit project actors from engaging in sexual activity with anyone under the age of 18 under any circumstances other than these. If a project actor engages in sexual activity with anyone under the age of 18 while engaged under the project, a range of employment sanctions shall apply, as set out in the CoC or Behavioral Standards, following a full and fair review.

²² See paragraphs 76-79 of [Civil Works GPN](#)

to the employer and is placed under the full control and responsibility of its managers (in contrast to criminal proceedings). The Bank has no role in establishing criminal responsibility of any individual in relation to an SEA/SH allegation, as this rests with the national justice system. The Bank also does not determine or impose disciplinary measures on a project actor – these are the responsibility of the employer. Employer sanctions imposed following verification of the misconduct should be appropriate to the seriousness of the action, and can range from verbal or written warnings through to demotion, financial penalties, or termination of employment. Because local laws may prohibit certain types of disciplinary measures or may require certain processes to be followed, these employer sanctions must be determined and carried out in a manner that is consistent with local labor legislation. They must also be consistent with applicable industrial agreements, as well as the individual worker’s employment contract.

Sensitization and Training

66. Borrowers should plan to incorporate sensitization and/or training on SEA/SH as appropriate for different parties, including project actors, project-affected people and others involved in service delivery. Sensitization or training is not a one-time requirement; rather, it is a continuing process throughout project implementation that is informed by the project activities and context. Sensitization methods may include communications such as posters, flyers, emails, and meetings. All sensitization efforts should include information about prohibited behavior, details on how to report allegations of SEA/SH, and how to access GBV service providers. In projects with low or moderate SEA/SH risk ratings, sensitization and information sharing during worker orientation and onboarding, as part of the rollout of the project grievance mechanism, and through posters in workplaces or facilities where services are delivered may be sufficient. In projects with high or substantial SEA/SH risk ratings, in-depth training and refresher training on a regular basis may be necessary, as well as outreach to local communities or beneficiaries. Training may be delivered as stand-alone sessions or integrated into existing training. Sensitization and training efforts should be appropriate to the roles and activities of different groups – for example, sensitization efforts with project actors may take a different form than outreach to intended beneficiaries. Within a project, people who are managing staff may require more in-depth guidance on handling issues of SEA/SH in the workplace. Information activities should reflect the types of SEA/SH risk present in the project, including risks to children and vulnerable groups. Where appropriate, the Borrower should post information on CoCs, Behavioral Standards and GM processes at implementing agencies and service providers. In all cases, these measures should enable people to understand prohibited behavior and how to report misconduct.

Grievance Mechanisms and Referrals for Survivors

67. **In all cases, project GMs should follow good practice in receiving, recording, and referring all SEA/SH complaints.** All Bank projects applying the ESF must have a GM “proportionate to the risks and impacts of the project.”²³ Good international industry practice calls for a survivor-centered approach by GMs receiving SEA/SH complaints. Because of the risk of stigmatization or backlash against persons reporting SEA/SH, it is important that GMs include multiple entry points and have clear protocols for recording SEA/SH complaints and providing referrals to existing quality GBV services. All GM staff should be trained to receive SEA/SH complaints, to frame questions in a non-accusatory manner, and to treat complainants with respect. In addition, staff should be trained to follow specific protocols when receiving complaints related to SEA/SH against children.
68. **When SEA/SH complaints are submitted or an allegation arises, Borrowers and Bank staff should consult existing guidance on handling SEA/SH cases in light of their respective roles.** SEA/SH case handling is generally not carried out by the GM itself; it receives and records grievances and refers the survivor to GBV services. The GM may also verify whether the allegation is linked to the project and will have an ongoing role in monitoring progress and conclusion of the complaint, including actions taken. Follow-up support to the survivor is provided by the GBV service providers, while the GM should monitor effective access to holistic care based on each survivor’s needs and wishes, and in line with the Accountability and Response Framework. Investigation, review, and disciplinary measures are handled by the Borrower and the project actor’s employer following the Accountability and Response Framework. It is the Borrower’s responsibility to take appropriate corrective actions. Specific guidance on considerations for GMs receiving SEA/SH complaints is included in the [Interim Technical Note: Grievance Mechanisms for SEA/SH in World Bank-financed Projects](#). Guidance on effective response and reporting of cases to management is set out in Chapter 5 of the [Civil Works GPN](#) and in the internal [E&S Incident Response Toolkit \(ESIRT\)](#).²⁴
69. **GM handling of SEA/SH complaints may take different forms.** Provided they have appropriate capacity and procedures, projects may use a broader established program, agency or national grievance mechanism to handle complaints. In some projects, SEA/SH complaints will be received through the general project-level GM for employees (under ESS2), or for the general public (ESS10). If existing GMs do not have the capacity or procedures in place to effectively manage SEA/SH complaints and cannot be adapted to do so, SEA/SH allegation management may be outsourced to a third party with dedicated GBV expertise (such as an NGO), reporting to the project GM. This may be particularly relevant in projects with a high SEA/SH risk rating. The [Interim Technical Note: Grievance](#)

²³ ES Policy, paragraph 60.

²⁴ ESIRT is an internal World Bank document that has been introduced to outline procedures for World Bank staff to report negative E&S incidents linked to IPF operations. ESIRT outlines the process for reporting SEA/SH cases and includes protocols to elevate incidents to different actors/units as appropriate.

[Mechanisms for SEA/SH in World Bank-financed Projects](#), has further information on these various GM models.

70. The following considerations are important for designing a SEA/SH responsive GM:

- ***The GM should adopt a survivor centered approach*** in which the safety and well-being of the SEA/SH survivor is the first priority and, in relation to adult GBV survivors, any action is only taken with the survivor’s consent.
- ***In order to act in the best interests of children***, GMs will need to have specific protocols for children who are survivors of SEA/SH. GM operators should be trained on how to respond to cases involving children, regardless of whether the child or a third party lodges the complaint.
- ***There should be multiple channels*** through which complaints can be registered in a safe and confidential manner, including through anonymous complaint reporting mechanisms.
- ***Information on how to report complaints*** should be disseminated among beneficiaries and communities.
- ***The GM should advise a survivor of any mandatory reporting requirement and limits of confidentiality.*** If a country’s legislation requires mandatory reporting, the GM and the GBV service provider should inform the implementing agency and the potential survivor of this obligation, as well as of any other limits of confidentiality.
- ***The personal information of a survivor must be protected.*** No identifiable information on the survivor should be stored in the GM and all information must be kept confidential. The GM should not require disclosure of, or record, information on aspects of the SEA/SH incident other than (a) the nature of the complaint (what the complainant says in her/his own words without direct questioning); (b) if, to the best of the complainant’s knowledge, the alleged perpetrator was associated with the project; and (c) if possible, the age and sex of the survivor. Where mandatory reporting requirements apply, information disclosure should be made in accordance with legal requirements, and information should only be released to the appropriate authority or agency.
- ***The GM should serve primarily to refer complainants to GBV service providers*** (whether related to the project or not) immediately after receiving a complaint. Where the complainant consents, the GM should initiate procedures to determine whether disciplinary measures should be implemented, as set out in the Accountability and Response Framework. The GM should also monitor follow-up actions and record resolution of the complaint in line with survivor-centered principles.
- ***The GM operates without prejudice to any other complaint mechanisms or legal recourse*** to which an individual or community may otherwise have access under national, regional, or international law, or under the rules and regulations of other institutions, agencies or commissions.

GBV Service Provider Identification and Mapping

71. **For project GMs to be able to respond appropriately to incidents of SEA/SH, it is important that the Borrower identifies in advance the available, quality GBV service providers to refer survivors for support.** GBV service providers play an essential role in supporting survivors and mitigating the harm of SEA/SH including through health services; psychosocial care; and security, legal, and financial support. However, the availability and quality of GBV service providers varies significantly in different countries and contexts where the Bank operates. At the time a complaint occurs, it is often too late to identify and evaluate a suitable GBV service provider for referral. For this reason, the PIU should seek to identify a referral pathway before project activities commence.
72. **Efforts to identify or map GBV service providers should be proportionate to the nature and scale of the project, and the project’s SEA/SH risk.** For projects with a low or moderate SEA/SH risk rating or with smaller physical footprints, it may be sufficient for the PIU to identify a quality GBV service provider that is accessible to complainants in the project area.²⁵ For projects with a substantial or high SEA/SH risk rating, or projects with a broader range of activities in different areas, it may be necessary for the PIU to identify more than one GBV service provider or to conduct a more in-depth mapping of different service providers prior to project activities commencing. Service provider identification or mapping may be enhanced and updated over time. Where programs are being implemented at national or regional scales, a mapping exercise may focus on actors operating at national and regional levels. Where project activities are restricted to specific localities, the mapping can be focused on the delivery of services in those locations.
73. **The Borrower is responsible for identifying a quality GBV service provider or mapping services available, although often the Bank may need to provide technical support.** In some cases, the PIU may have internal capacity to screen and identify a GBV service provider. In other cases, the PIU may need to engage an external consultant, NGO, or firm with expertise on collecting data on GBV services as part of project preparation. In such cases, the PIU prepares the TOR for service provider identification or mapping as part of the social assessment. The Bank task team may review the TOR and provide support to the PIU in reviewing the scope and findings of the identification or mapping exercise.
74. **GBV service provider identification or mapping should draw on existing information sources.** In some cases, the Country Management Unit may have undertaken a portfolio

²⁵ Teams should consult national guides or standards for case management of SEA/SH incidents, where available. Quality standards for medical care can be found at the *Gender-Based Violence Quality Assurance Tool* (WHO 2018). <https://www.aidsdatahub.org/resource/gender-based-violence-quality-assurance-tool>

Other service standards can be found in the *Essential services package for women and girls subject to violence* (UN Women, 2015). <https://www.unwomen.org/en/digital-library/publications/2015/12/essential-services-package-for-women-and-girls-subject-to-violence>

approach to mapping available GBV service providers to which projects can refer. The Bank has undertaken several regional- and country-level efforts to map and assess GBV service providers (see Box 9). Other mappings of GBV services in a given country, region, or community may already exist, particularly in humanitarian crisis settings. This mapping may have been done previously by the PIU/Borrower, the Bank, other multilateral development banks, UN Agencies, NGOs or others operating in the region. The mapping of GBV service providers should be verified by the Borrower, with support from the Bank task team, during project preparation, as funding for GBV service provision is scarce and can shift rapidly.

75. **If pre-existing mapping information is not available, it is recommended that the Borrower conduct a project-specific exercise to identify at least one quality GBV service provider covering the relevant area.** The PIU may refer to information available through in-country GBV working groups²⁶ or communities of practice, particularly in settings affected by Fragility, Conflict and Violence (FCV) or through government agencies responsible for the provision of services to survivors of GBV (in middle-income country contexts). Efforts to identify service providers should take into account the needs of children, minority groups, accessibility needs for persons with disabilities, and any other groups with specific constraints related to access. Further information on identifying and working with quality GBV service providers is available in the [Civil Works GPN](#) (Chapter 5 and Annex 5).
76. **Where no quality GBV service providers are available, projects should consider additional steps to support survivors of SEA/SH.** Such actions should be tailored to the project's risk level, social and security context, and activities, and should be adequately resourced. Task teams should contact their Regional Social Sustainability and Inclusion (SSI) GBV Focal Point for additional guidance on appropriate measures.²⁷ These may include, for example:
- Providing training and support resources for focal points or female counselors at the facility-level (e.g., schools, clinics, hospitals, distribution levels) to provide basic psychosocial and well-being support services to survivors who report SEA/SH, as appropriate;
 - Developing access to services, including recruiting GBV service providers to provide dedicated support to the project;
 - Developing capacity-building partnerships with UN Agencies or NGOs, where appropriate;

²⁶ In low- and middle-income countries, UN agencies chair GBV coordination mechanisms with government partners that involve key donors and civil society organizations responsible for service provision. In emergency situations, UNFPA coordinates GBV response under the umbrella of the Global Protection Cluster – a network of NGOs, international organizations and UN agencies engaged in protection work in humanitarian crises including armed conflict and disasters. In other contexts, UN Women leads GBV coordination mechanisms. A mapping of key programs is typically available through this coordination group and regularly updated by UNFPA or UN Women.

²⁷ Refer to the World Bank Intranet [SEA/SH Risk Screening](#) page for a list of Regional SSI GBV Focal Points.

- Supporting remote access to services as appropriate, including psychosocial care and telemedicine.

Box 9. Bank-led Collaboration to Map GBV Service Providers

South Asia Region: Bank-led regional mapping of GBV services

In the South Asia Region (SAR), the Bank Social team led a regional mapping of GBV services to identify prominent organizations that can respond to GBV in South Asian countries. The mapping includes disaggregated information by state and province where applicable. This regional mapping is a helpful start for task teams in terms of contacting organizations that have been vetted in areas where Bank projects may be active. At the project level, this basic data will need to be further refined to match specific project needs.

Nigeria: Project-level mapping to build data at the country-level

In Nigeria, a standard data collection tool that covers five different types of services was developed. Each Bank project is encouraged to use this tool to collect data, which is then plotted onto one map for the entire country. The data is displayed on the map with an interface that allows users to zoom in and out of the map to find services in their location. Each service provider is represented by an icon which, when selected, displays information including location, opening hours, types of services provided, fees (if any), types of clients/ patients/ survivors catered to, and other relevant information. The long-term goal of the country mapping in Nigeria is to have this site hosted by the Ministry of Women's Affairs, which would also undertake the data collection and updating. This will eventually lead to a publicly available map that covers the entire country and is updated annually.

Francophone Africa: Project-level mapping to build data at the regional level

In four countries of Francophone Africa (Mali, Burkina Faso, Niger and Chad), mapping of service providers uses the same standardized tools for data collection. Area PIUs have been trained to collect this data as part of project preparation and/or early implementation. All PIUs have access to the information input by other PIUs in real-time. After 12 months, data remains visible but grayed out, flagging the need to reconfirm its accuracy.

Considerations for Recruitment of Staff

77. **HD Operations may encourage gender-sensitive staffing or equitable recruitment in the project at all levels, including women in management/leadership positions.** In addition to ensuring that individuals with required expertise are engaged, projects may consider how gender-sensitive staffing of the PIU or of certain services or facilities can support SEA/SH mitigation measures. For example, projects may aim to staff each of their facilities with female and male health workers, especially in contexts where women report a higher comfort level with female health workers than with male health workers.
78. **HD Operations that include service delivery to children and vulnerable groups may take additional steps to recruit and screen workers for specific roles.** Child- and student-safe recruitment refers to the use of procedures to screen/identify people who aim to work with

children (teachers, principals, day care operators, etc.). Such procedures reduce the risk that a person who has or will exploit or abuse children/students will be hired. Some recruitment practices include undertaking background checks and checking professional references, whereby those who have committed any such offences are not hired.

Creating Safe Spaces at the Facility-level

79. **Borrowers should consider how the physical facilities they use or develop can help to reduce the risk of SEA/SH.** Where HD Operations include civil works components, teams should refer to specific guidance set out in the [Civil Works GPN](#). In addition, HD Operations that include construction or refurbishment of facilities, or projects with higher SEA/SH risk levels, may assess whether project facilities (schools, hospitals, clinics, distribution centers, etc.) follow good practices for reducing SEA/SH risks. Such good practices may include:

- Having separate, safe and easily accessible facilities (e.g., toilets, sleeping areas) for male and female users, which can be locked from the inside;
- Having safe, accessible, well-lit waiting areas and other public spaces (such as parking lots, construction sites);
- Visibly displaying signs around the project site (if applicable) that signal to workers and the community that the project site is an area where SEA/SH is prohibited; or is a safe, SEA/SH free zone.

For projects with a high SEA/SH risk rating, the Borrower should consider conducting a safety audit mapping at the facility-level (e.g., schools, clinics, distribution centers), as appropriate.²⁸

Monitoring

80. **Projects should monitor SEA/SH mitigation activities.** Monitoring and evaluation (M&E) plays a key role in assessing the effectiveness of SEA/SH mitigation measures. As part of the M&E process, it is recommended that teams select indicators to monitor. Examples include: (a) number of training courses related to SEA/SH delivered; (b) percentage of project actors who have agreed to a CoC; (c) percentage of project actors who have attended CoC or SEA/SH trainings; or (d) percentage of SEA/SH cases handled in line with quality requirements/established protocols. GM indicators may also be useful to monitor the time taken to resolve a SEA/SH-related complaint.

81. **Bank task teams also monitor the E&S performance of the project in accordance with the legal agreement and ESCP (including SEA/SH risk management commitments).**²⁹

The extent and mode of Bank monitoring is proportionate to the potential risks and

²⁸ See UNICEF. January 2018. Safety Audits: A How-To Guide. Available at: <https://gbvguidelines.org/wp/wp-content/uploads/2021/06/Safety-Audit-How-to-Guide.pdf>

Sector-based audit guidance is available on the GBV Guidelines website:

<https://gbvguidelines.org/cctopic/assessments-me-and-measurement-for-gbv-risk-mitigation/>

²⁹ ES Policy, section H.

impacts. Where appropriate and as set out in the ESCP, the Bank will require the Borrower to engage stakeholders and third parties to complement or verify project monitoring information. Information related to Bank supervision of SEA/SH commitments should be integrated into:

- **Aide Memoires:** Aide Memoires should include the data provided by key project actors;
- **ESMS and ISRs:** The ESMS/ISRs should include updates on the status of the SEA/SH mitigation and response activities on the project, as well as on any indicators that may be included in the Results Framework.

82. Staff should be aware of data privacy considerations as they relate to information gathering and recording. While Bank staff do not have a direct role in investigating or responding to SEA/SH incidents, Bank staff who are monitoring HD Operations for SEA/SH mitigation and incident response may have access to sensitive personal information about survivors and other individuals. Data protection is essential to the survivor-centered approach because unauthorized access, use, or sharing of data can endanger survivors, their families, and communities.³⁰ If Bank task teams obtain personal information as part of project supervision and reporting, this information must be handled in accordance with relevant World Bank policies and procedures.³¹ Personal Data includes any information relating to an identified or identifiable individual and may include photographs of people. Information relating to a person’s private sphere, such as data relating to health or sexual orientation, may be considered Sensitive Personal Data that requires increased security measures.

83. Bank staff should also take into account ethical considerations in filming or photographing Bank-supported projects. When taking photographs, or recording audio or video, Bank staff, including consultants or vendors working on behalf of the Bank, should ensure that all subjects agree to be filmed, recorded or photographed.³² When photographing or filming patients, the elderly, and children, legal guardians or parents must provide consent beforehand.³³

³⁰ For more information about data protection in the context of GBV, see the Gender-based violence information management system, <https://www.gbvims.com/data-protection/>

³¹ World Bank Group Policy, *Personal Data Privacy*, May 20, 2020; World Bank Group Directive, *Personal Data Privacy*, April 27, 2021; World Bank Group *Information Classification and Control Policy*, AMS 6.21A, June 2010.

³² Multimedia: Ethical Guidelines for World Bank Productions, available (internal) at: <https://worldbankgroup.sharepoint.com/sites/wbsites/digital-communications/Pages/SitePages/MultimediaEthicalGuidelinesforWorldBankProductions.aspx-235000.aspx>

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Annex 1: SEA/SH Risk Screening Tool

National-level Questions

1. **The first set of questions in the SEA/SH Risk Screening Tool focuses on indicators of SEA/SH risk at the national level.** They aim to capture the prevalence of violence in the country, the legal context, gender norms and beliefs, and national-level capacity to respond to GBV (see **Table A1.1**). These questions provide information to task teams on the overall environment with relation to GBV at a national level. SEA/SH is a form of GBV that shares risk factors with other forms of GBV, including, among others, child marriage, sexual assault, and intimate partner violence. The questions can also serve as an entry point for exploring resources and interviewing key informants that may help in assessing project-related risks. In the overall SEA/SH risk rating for the project, the thirteen questions in this first set are weighed less heavily by the Tool than the project-related questions. The section below on country-context indicators provides further information on the data and indicators used in relation to each of the questions.

Country-level GBV prevalence	
1.	<i>How prevalent is intimate partner violence?</i>
2.	<i>How prevalent is any form of sexual violence?</i>
3.	<i>How prevalent is child marriage?</i>
4.	<i>Does the country meet minimum standards to prevent human trafficking?</i>
5.	<i>Is the country on the FCV country list?</i>
Legal context	
6.	<i>Does the country have laws banning sexual harassment?</i>
7.	<i>Does the country have laws banning marital rape?</i>
8.	<i>Does the country have laws banning domestic violence?</i>
Gender norms and beliefs	
9.	<i>How commonly do women consider some domestic violence to be justified?</i>
10.	<i>How commonly do women seek help to stop physical or sexual violence?</i>
National-level capacity to respond to GBV	
11.	<i>Does the country have a national action plan on addressing violence against women and girls?</i>
12.	<i>Does the country have a national GBV working group?</i>
13.	<i>Does the country have a national referral pathway protocol on GBV?</i>

Project-specific Questions

2. **The second section of the Tool focuses on project context questions.** These questions span general questions about the location and preparation of a project, as well as sector-specific questions regarding the project context and activities. A full set of project-level

¹ Note that these questions may be updated and refined over time as additional relevant data becomes available. For updated data reports on country related indicators please email: SEAHscreening@worldbank.org

questions is set out for each sector in Annexes 2-4, along with criteria for the risk rating and rationale for each question. Table A1.2 sets out examples of these project-specific questions.

Table A1.2: Sample SEA/SH Risk Screening Tool – Project-level Questions
Examples of General Project-level Questions
<i>Are project activities implemented in areas of the country experiencing a humanitarian emergency?</i>
<i>As part of project preparation, was there meaningful consultation with groups advocating for women, children, and adolescent girls?</i>
<i>During stakeholder consultations, did groups advocating for women, children, and adolescent girls raise concerns about the project’s potential additional SEA/SH risks?</i>
Examples of Education-Specific Questions
<i>Does the project include plans/provisions for primary or secondary boarding facilities or any remote living situations for students?</i>
<i>Are there significantly more male teachers than female teachers in the schools relevant to the project?</i>
<i>Are there measures in place to support teachers/school staff recruitment that is “student/child-safe”?</i>
Examples of Social Protection and Jobs-Specific Questions
<i>Do mechanisms for the selection of beneficiaries create opportunities for individual project actors to sexually exploit or abuse beneficiaries?</i>
<i>Do mechanisms for the transfer of benefits create opportunities for project actors to sexually exploit or abuse project beneficiaries?</i>
<i>Does the project involve engagement with military or paid security forces who come in direct contact with beneficiaries?</i>
Examples of Health, Nutrition and Population-Specific Questions
<i>Do end-users of health services know the true cost of health services and medicines?</i>
<i>Does the health system include protocols on how to respond to survivors of GBV seeking care?</i>
<i>Are female workers in close proximity to male workers with limited supervision?</i>

Completing and Using the SEA/SH Risk Screening Tool

- The Tool should be updated and referred to by the Bank task team throughout the project cycle.** The TTL, SD Specialists and SEA/SH consultants (where relevant) can collaborate in responding to the questions in the Tool.² The TTL is responsible for ensuring the Tool is filled out with high quality information. As described in detail below on timing, the task team discusses the questions with the Borrower as needed.

² A World Bank email address is required to access the SEA/SH Risk Screening Tool.

- At the **project concept stage**, the Tool informs the concept stage ESRS. Once the SEA/SH risk rating is determined and agreed by the task team, this information and rating will contribute to discussions with the Borrower about appropriate mitigation measures and will be reflected in the project documentation such as the PAD, SEP, ESMP/ESMF, and draft ESCP.
 - Prior to **project appraisal**, the Tool may be updated to inform the appraisal stage ESRS. The draft PAD provided for the decision meeting will: (i) include the SEA/SH risk rating agreed by the task team to be confirmed at the decision meeting; and (ii) highlight the main risks related to SEA/SH and corresponding mitigation measures.
 - During **project implementation**, the SEA/SH risk rating will need to be monitored by the Bank task team to assess whether there are circumstances which might change the level of risk. The rating may be adjusted, for example, if anticipated risks have been monitored and shown not to materialize.
4. **Completing the Tool requires adequate data, which may be difficult to find.** Task teams are advised to work with SD Specialists and utilize available data, or relevant proxy data, to adequately identify the level of risk. SD Specialists who are part of the team will be an important resource for completing the Tool and helping the Borrower in identifying, designing and implementing the mitigation measures. GBV focal points/specialists³ within SD can also provide support.

Country Context Indicators

Country GBV prevalence: The following indicators provide an estimate at the national level of the prevalence of intimate partner violence and sexual violence perpetrated by a partner or non-partner.

1. [Prevalence of intimate partner violence](#)

This statistic is intended to give an overview of levels of IPV in the country. No direct correlation has been established between the risk of SEA within a project and the national level of violence against women. However, this statistic is important for understanding the country context within which the project occurs. The national IPV prevalence is compared with the regional average as per estimates provided in Demographic and Health Surveys (DHS, program supported by USAID):

Higher risk is having national IPV prevalence above regional average per DHS;

Lower risk is having national IPV prevalence below the regional average per DHS.

2. [Prevalence of any form of sexual violence \(SV\)](#)

Similar to the previous indicator, this statistic is intended to give an overview of levels of any form of SV against women and girls in the country. No direct correlation has been established between risk of SEA within a project and the national level of violence against women. However, this statistic is important for giving a sense of the country context within which the project occurs. The national prevalence of SV by any perpetrator is compared with the regional average:

Higher risk is having SV prevalence above regional average per DHS;

³ This (internal) link provides a list of focal points by region: <https://radweb.worldbank.org/gendersea/process-and-resources>

Lower risk is having SV prevalence below the regional average per DHS.

- 3. [Prevalence of child marriage \(defined as marriage before exact age of 18 as reported by women\).](#)** Early/child marriage is often forced marriage, which is a form of violence experienced by girls across the globe. Similar to the previous two indicators, this statistic captures another expression of violence experienced by women and girls. In addition, early marriage in some countries, like India, is a robust predictor of experiencing other forms of GBV like IPV. No direct correlation has been established between risk of SEA within a project and national levels of violence against women. However, this statistic is important for giving a sense of the country context within which the project occurs. The national prevalence of early/child marriage (marriage before the exact age of 18) is compared to global averages of child marriage and distributed into three categories of risk:

Lower risk is having an early/child marriage prevalence of 0-23.9%;

Medium risk is having an early/child prevalence of 24-36.9%;

Higher risk is having an early/child marriage prevalence of 37-100%.

- 4. [US State Department Trafficking in Persons Report:](#)**

The Trafficking in Persons (TIP) Report is generated every year by the US Government and represents a resource to understand governmental anti-trafficking efforts. The TIP Report categorizes countries into one of three tiers based on the extent of their governments' efforts to comply with the "minimum standards for the elimination of trafficking." Tier I countries are those whose governments fully meet the minimum standards of the US Trafficking Victims Protection Act (TVPA). Tier II countries are those whose governments do not fully meet the TVPA's minimum standards but are making significant efforts to bring themselves into compliance with those standards. The Tier II watchlist includes countries that in addition to making efforts to comply with standards typically have very significant or rising absolute numbers of victims of severe forms of trafficking and there is a failure to provide evidence of increasing efforts to combat them.⁴ Tier III countries are those governments do not fully meet the minimum standards and are not making significant efforts to do so.

Lower risk is Tier I;

Medium risk is Tier II;

Higher risk is Tier III and Tier II watch list.

- 5. [Is the country on the FCV country list?](#)**

This indicator captures whether the area where the project will be/is being implemented is undergoing a humanitarian or emergency crisis such as a natural disaster, conflict, epidemic, or famine, according to the World Bank's most recent list of Fragile and Conflict-affected Situations: <http://pubdocs.worldbank.org/en/179011582771134576/FCS-FY20.pdf>:

Lower risk is if not on the list;

Higher risk is if on the list.

⁴ Such efforts include increased investigations, prosecutions, and convictions of trafficking crimes, increased assistance to victims, and decreasing evidence of complicity in severe forms of trafficking by government officials. A country may also be placed on the Tier II watch list if the determination that a country is making significant efforts to meet the minimum standards was based on commitments by the country to take additional future steps over the next year.

Legal context: This section seeks to assess the legal climate in the country by reviewing the extent to which laws recognize different forms of GBV, provide penalties for those who commit them, and protect women and girls. While having a written law is not a guarantee of enforcement or changes in norms, this can still serve as an indicator of a country's commitment to addressing issues related to different manifestations of GBV against women and girls. The existence of four relevant laws are documented.

6. [Laws on sexual harassment](#)

Recognizing that sexual harassment is a serious issue with repercussions for a country's ability to welcome women into the workforce is a first step to creating a more equitable environment:

Higher risk is having no laws on sexual harassment;

Lower risk is having laws on sexual harassment.

7. [Laws on marital rape](#)

Marital rape occurs when there is sexual intercourse between spouses without one party's consent. It is a form of domestic violence and a violation of a woman's human right to decide whether and when to have sexual relations:

Higher risk is having no laws banning marital rape;

Lower risk is having laws banning marital rape.

8. [Laws on domestic violence](#)

Domestic violence is defined as exhibiting violent or aggressive behavior within the home, typically involving the violent abuse of a spouse or partner. It may take the form of emotional or psychological abuse, physical abuse, or sexual abuse and has negative consequences for the mental, physical, and reproductive health of the victim, as well as potentially for those also living in the abusive household:

Higher risk is having no laws banning domestic violence;

Lower risk is having laws banning domestic violence.

Gender norms and beliefs: Attitudes, beliefs, norms, and structures that promote and/or condone gender-based discrimination and unequal power are among the root causes of GBV.⁵ There is evidence that social norms that limit the expected behavior of women and men based on their socially ascribed roles are associated with health behaviors, including GBV. Research has shown that violence against women and girls emerges from the interplay of multiple interacting factors, and there is no one determinant of violence, but it is deeply rooted in gender inequality and social norms that condone violence and control over women.⁶

⁵ IASC. 2015. Guidelines for Integrating GBV Interventions into Humanitarian Settings.

<https://interagencystandingcommittee.org/system/files/2021-03/IASC%20Guidelines%20for%20Integrating%20Gender-Based%20Violence%20Interventions%20in%20Humanitarian%20Action%2C%202015.pdf>

⁶ Heise, Lori. 2011. "What works to prevent partner violence: An evidence overview." London, UK: STRIVE Research Consortium <http://strive.lshtm.ac.uk/resources/what-works-prevent-partner-violence-evidence-overview>. Fulu, Emma and Alice Kerr Wilson. 2015. "What works to prevent violence against women and girls evidence reviews Paper 2 Interventions to prevent violence against women and girls" <https://www.whatworks.co.za/resources/evidence-reviews/item/70-global-evidence-reviews-paper-2-interventions-to-prevent-violence-against-women-and-girls>. Jewkes, Rachel, Emma Fulu, Ruchira Tabassam Naved,

9. [Wife beating justified for at least one specific reason](#)

This indicator shows the percentage of women who agree that a husband is justified in hitting or beating his wife for at least one specific reason (typically the questioner asks respondents whether wife beating is justified if a woman burns the food, argues with her husband, goes out without telling him, neglects the children, or refuses to have sex with him) (DHS):

Lower risk is below regional average (calculated from DHS);

Higher risk is above regional average (calculated from DHS).

10. [Help seeking to stop violence](#)

This indicator shows the percentage of ever-married women who have ever experienced any physical or sexual violence who sought help to stop violence either by telling someone or by seeking support from services. Among women who seek help, most look to family and friends and very few look to formal institutions and mechanisms, such as police and health services. A minority of those women seeking help for experience of violence do so by appealing to the police (UN Department of Economic and Social Affairs, 2015)

Lower risk is having help-seeking levels above regional average (calculated from DHS);

Higher risk is having help-seeking levels below regional average (calculated from DHS).

National-level capacity to respond to GBV: This section addresses the capacity of the country to respond to GBV, focusing on whether the country has an action plan on women, peace and security, an established and functional GBV working group and a national referral pathway protocol, since they reflect national commitment to address GBV, and contribute to creating an environment that can successfully mitigate GBV risks and organize actions to address its consequences.

11. [National action plan on addressing violence against women and girls/GBV:](#)

This indicator determines whether the country has a national action plan on addressing violence against women and girls/GBV, which may indicate the country's commitment to addressing pressing GBV issues and provides a resource for Bank staff to learn about critical issues regarding violence that women face. The plans are a good source for sectoral commitments and priorities for addressing the pandemic of GBV.

Lower risk is having an action plan;

Higher risk is not having an action plan.

12. [GBV working group:](#)

Does the country have a national GBV working group? GBV working groups seek to ensure more effective, accountable and comprehensive GBV prevention and response. Ideally GBV coordination groups should be established at both the national and sub-national levels to coordinate national-level policy, advocacy, and data collection, with sub-national level operational guidance and oversight for programs on the ground. This engagement suggests a commitment to addressing pressing GBV issues in the country and provides a resource for Bank staff to engage with and learn about key issues in the

Esnat Chirwa, Kristin Dunkle, Regine Haardörfer, Claudia Garcia-Moreno, on behalf of the UN Multi-country Study on Men and Violence Study Team. 2017. "Women's and men's reports of past-year prevalence of intimate partner violence and rape and women's risk factors for intimate partner violence: A multicountry cross-sectional study in Asia and the Pacific." *PLOS Medicine* 14(9) September 2017. <https://doi.org/10.1371/journal.pmed.1002381>

country, how GBV is being addressed and how the Bank can align its actions to prevent or mitigate risks of GBV with ongoing efforts. To find out if a country has a national GBV working group, task teams can ask relevant stakeholders such as the ministry of gender, local organizations, women's groups, NGOs or multilaterals such as the United Nations Population Fund (UNFPA), UN Women, United Nations Children's Fund (UNICEF) and WHO. If the country is experiencing a humanitarian emergency, task teams can contact UNFPA or UNICEF, who co-lead the GBV Area of Responsibility (AOR).⁷ At the field level, the national GBV working group facilitates implementation of GBV programming in an acute humanitarian emergency setting, including liaison and coordination with other clusters/organizations, training and sensitization, strategic planning, monitoring and evaluation.

Lower risk is having a GBV working group with a national and sub-national body in place including in the project area;

Medium risk is having a GBV working group with a national coordination level in place or a few sub-national coordination structures in place;

Higher risk is not having a GBV working group in place.

13. [Does the country have a National referral pathway protocol on GBV?](#)

A referral system helps women, girls, other at risk-groups and GBV survivors to safely and quickly access health, psychosocial, protection, legal, and socio-economic services and support. At a minimum, this requires (a) an effective system of care comprised of a network of identified actors and service providers; and (b) an established referral pathway detailing where and how survivors can access these services. A referral pathway is a flexible mechanism that safely links survivors to supportive and competent systems of care, such as medical care, mental health and psychosocial services, police assistance, and legal and justice support (IASC 2015).

Higher risk: No national referral pathway protocol;

Lower risk: There is a national referral pathway protocol.

⁷ The GBV Area of Responsibility (AoR), led by the United Nations Population Fund (UNFPA), is the global level forum for coordination and collaboration on GBV prevention and response in humanitarian crisis settings. The group brings together NGOs, UN Agencies, donors, academics and independent experts under the shared objectives of ensuring life-saving, predictable, accountable and effective GBV prevention, risk mitigation and response in emergencies, both natural disaster and conflict-related humanitarian contexts. Established in 2008, the GBV AoR is a functional component of the Global Protection Cluster (GPC).

Annex 2: Education Sector Context and Project Questions

- 1. The education sector provides financing, analysis, and policy advice to help countries to increase access to quality education for all – providing equitable opportunities for all people to acquire the knowledge and skills they need to have healthy and satisfying lives, to be good citizens, and to be productive contributors to their country’s economic development.** Research shows that education is an important tool for girls’ and women’s empowerment and is associated with positive outcomes in various domains. At the same time, the education sector is imbued with power differentials. These power differentials exist between administrative staff and teachers, teachers/administrative staff and students, among students, between parents and school staff, and between students and the community. Unfortunately, persons with influence and power over others can misuse this influence and power during project implementation. Further, girls and women are often exposed to GBV, including SEA/SH, in and around schools in various forms (sex-for-grades, etc.) committed by a wide range of perpetrators. Boys are also at risk of experiencing SEA/SH, with women and girls being disproportionately affected given the depth of gender inequality, a main driver of violence experienced by women and girls.
- 2. The education sector has an important role to play in supporting the identification and path to recovery for children and women who have experienced violence.**¹ As articulated under the *Safe and Inclusive Schools* pillar of the World Bank’s education strategy, contributing towards a safe learning environment to maintain continued access to, as well as quality of, education is crucial for countries to nurture their human capital as well as to achieve development goals. Educating and empowering girls and women, increasing their agency and access to resources, and their participation in these programs may, in some instances, also expose them to additional risks. This is a result of several factors including, among others: shifting power dynamics and departure from inequitable social norms, lack of accountability, poor infrastructure, safety and security issues either at school or en route, etc. At the same time, schools are often a central location for communities and can provide an important entry point for preventing GBV more broadly, identifying girls and women who have experienced GBV, and referring them to necessary services. In order to mitigate against the SEA/SH risks, it is important to understand how project design and project activities may create conditions that trigger or exacerbate such risks, in particular for women and girls,² and to put in place mitigation measures that seek to prevent SEA/SH. Education projects may also provide

¹ For guidance on how the education sector can engage in the prevention and response to violence against women and girls, see Gennari, Floriza, Anne-Marie Urban, Jennifer McCleary-Sills, Diana Arango, Sveinung Kiplesund. 2014. Violence Against Women and Girls : Education Sector Brief. World Bank, Washington, DC.

<https://openknowledge.worldbank.org/handle/10986/21088>

² Men and boys can also be exposed to risks of SEA/SH; it is important to consider particular circumstances in which men and boys are at risk of SEA/SH, particularly in relation to minors interacting with adults in positions of power. Mitigation measures proposed in this GPN may also protect boys from SEA/SH.

an entry point for a broader dialogue with Borrowers on strengthening their national systems to respond to SEA/SH within existing governance structures.

Table A2.1: Examples of SEA/SH that may be Perpetrated by Project Actors^a in Bank-supported Education Operations
<p>Sexual Exploitation: Sexual exploitation occurs when a project actor conditions access to a Bank-financed project benefit, service, good, or employment-related benefit on extracting sexual favors</p> <ul style="list-style-type: none"> - A teacher/school administrator/janitor asks a student for sexual favor in exchange for good grades/other benefits inside and outside the education setting - An administrator threatens to deny, or denies, a student admission to an education setting, unless the student does him/her sexual favors - An administrator asks for sexual favor from a teacher as a condition of tenure/promotion - A vocational skills training teacher asks for sex in exchange for training certification of a beneficiary - Participation in a community education committee to support education system strengthening is allowed in exchange for sexual favors - In a project that finances school transportation service, the driver/conductor sexually exploits a student in exchange for access to transportation
<p>Sexual Abuse: Sexual abuse occurs when a project actor uses force or unequal power relation vis-a-vis a beneficiary, community member, or colleague to perpetrate or threaten to perpetrate an unwanted sexual act</p> <ul style="list-style-type: none"> - A teacher/janitor sexually assaults a student/another teacher inside/outside school premises - A teacher/janitor/administrator sexually assaults a student's parent or caregiver - A hostel warden/worker sexually assaults/abuses student(s)
<p>Sexual Harassment: Sexual harassment occurs when a project actor makes unwelcome sexual advances to, or requests sexual favors or acts of a sexual nature from other project actors</p> <ul style="list-style-type: none"> - A school administrator, teacher, or janitor sends a sexually explicit letter or text message to a another individual of any of those categories - A project actor leaves a sexually explicit picture on a co-worker's desk - A school head or teacher asks all female/male employees/students to greet him/her with a kiss on the cheek every day - A male or female teacher touches a student or another colleague with sexual intention for his/her pleasure and/or suggests they meet up after school - A teacher uses explicit, sexual, and inappropriate language on school premises hindering a friendly and harassment free environment

^a See definition in Table 1 above in main text.

SEA/SH Risk Screening Tool: questions and scoring

3. **Focus of the SEA/SH Risk Screening Tool and types of questions.** The Tool takes into consideration contextual risk factors at the country and community levels and project-specific risk factors. A composite SEA/SH risk rating is then calculated based on

aggregation of risk ratings for the questions and corresponds to either a Low, Moderate, Substantial, or High risk rating (see Table A.2.2).

Table A2.2: SEA/SH Risk Scoring for Education Sector Projects

Risk Tier	Score out of 25
Low risk	0-7
Moderate risk	7.25-13.0
Substantial risk	13.25-16.0
High risk	16.25-25

The SEA/SH Risk Screening Tool: Project context questions/indicators

4. **The second section of the Tool focuses on project context questions. The task team should answer the project-specific questions when preparing an Education project.** The task team discusses the questions with the client as needed. **Table A2.3** below presents the questions and explanations as to why each is relevant when assessing the likelihood of exacerbating SEA/SH risks.

Table A2.3: SEA/SH Risk Screening Tool – Project-related Questions for Education Sector

Risk screening tool question and risk level	Rationale for question
<p>1. Is your project in a humanitarian emergency or FCV part of the country?</p> <hr/> <p>Criteria: <i>Lower risk is that the project area is not in a humanitarian emergency or FCV part of the country</i> <i>Higher risk is that the project is in a humanitarian emergency or FCV part of the country</i></p>	<ul style="list-style-type: none"> • This indicator captures whether the area where the project will be/is being implemented is a setting where any parts of the project are experiencing a humanitarian or emergency crisis, such as a natural disaster, conflict, epidemic, or famine, or with a population that has experienced forced displacement. • In these environments, people may have experienced traumatic events, social norms may have changed, the social fabric may have broken down, the rule of law may be difficult to enforce, and program supervision may be difficult. • Women and children are often unaccompanied, or children have lost their parents during forced displacement, thus increasing their vulnerability, and there is often limited security in camps for internally displaced persons (IDPs) and refugees. • Dependence on emergency assistance and the lack of control over one’s environment, increases risks of SEA, with people being forced to exchange sex for aid or to have their basic needs met.
<p>2. Are there initiatives at the school level in which the project is intervening (including early childhood, basic, technical/vocational or higher education institutions) to educate school staff, local communities, and students about GBV?</p> <hr/> <p>Criteria: <i>Lower risk is having initiatives to raise awareness of GBV</i> <i>Higher risk is not having initiatives to raise awareness of GBV</i></p>	<ul style="list-style-type: none"> • The willingness of schools and the local community to discuss GBV can indicate an understanding that GBV is unacceptable and should be prevented. • In project area schools in which the project seeks to intervene campaigns, lectures, classes, training, and/or initiatives with school counselors to communicate with staff and students about GBV can help contribute to prevention as well as reporting of potential abuses. • Specifically, the training could include information on reporting mechanisms and follow-up for exposure to GBV, including SEA; gender- and age-responsive materials and services available to support survivors of GBV in the learning environment; and information on protocols for GBV, including referral pathways.
<p>3. Does the project include plans/provisions for primary or secondary boarding facilities or any remote living situations for students?</p> <hr/> <p>Criteria: <i>Lower risk is that the project does not include plans for boarding facilities or remote living</i> <i>Higher risk is that the project includes plans for boarding facilities or remote living</i></p>	<ul style="list-style-type: none"> • Children living away from their families and social networks may be at higher risk of GBV, including SEA. This indicator intends to assess whether the project will include boarding facilities or other remote living situations.
<p>4. During project preparation, were consultations undertaken with women’s groups, groups that advocate for children and adolescent rights, and other stakeholders, including children?</p>	

Risk screening tool question and risk level	Rationale for question
<p>Criteria: Lower risk is having undertaken consultations with women’s groups in a safe environment to allow free participation and such consultation shows relatively low risk of SEA/SH Higher risk is not having undertaken consultations with women’s groups in a safe environment to allow free participation or that consultation indicates high levels of SEA/SH risks in the community</p>	<ul style="list-style-type: none"> • This approach allows for a better understanding of the patterns of/specific vulnerabilities to GBV in project-affected area(s). These concerns may not be raised by participants as it is a sensitive topic. As such, GBV information should <u>never</u> be directly solicited by those who lack specific experience and training in GBV data collection (see Annex 3 for further guidance). • Consultations with local women may also provide resources for alerting task teams to abuses during a project and can provide insight into which GBV services are available in a community. Recommendations, concerns and requests that arise in these consultations should be systematically documented and addressed to the extent possible.
<p>5. During consultations and preparation (mentioned in the previous question), were issues or concerns related to GBV raised organically (meaning with no solicitation) during engagement/discussions with the community?</p> <p>Criteria: Lower risk is when concerns did not arise during community discussions Higher risk is when concerns have arisen in community discussions</p>	<ul style="list-style-type: none"> • This indicator intends to recognize issues that might have been identified in social risk assessment processes and other stakeholder engagement opportunities, such as discussions and interviews with community or local organization representatives undertaken by the client during project preparation. • At concept stage, consultations might not have been possible and are more likely to be undertaken as project preparation advances. As a result of this, the value for this indicator in most cases, and potentially the overall rating, would be different later in project preparation.
<p>6. Does the education sector/system have concrete actions or responsibilities/obligations related to GBV?</p> <p>Criteria: Lower risk is having actions or responsibilities related to GBV Higher risk is not having actions or responsibilities related to GBV</p>	<ul style="list-style-type: none"> • If the issue of GBV—and related concrete actions that are endorsed/required by the education sector, and responsibilities for these actions—is evident in the education sector plan, education strategies, or education-related legal framework, this is a signal that the government is taking steps to address GBV. Specifically, having written text highlighting the importance of preventing and responding to GBV is an important step in addressing this problem and can have positive benefits in the education system. Additionally, it would be important to consider if adequate resources are being provided to support these measures (or if they are primarily on paper)
<p>7. Are there existing mechanisms for students and/or teachers to report instances of violence which occur at school or are caused by someone from school?</p> <p>Criteria: Lower risk is having mechanisms previously established for teachers and/or students to report violence, with mention of GBV specifically Higher risk is not having any previously established mechanisms for teachers and/or students to report violence</p>	<ul style="list-style-type: none"> • This question assesses whether, prior to the project, there were reporting mechanisms that were created for students, including vulnerable students (girls, children with disabilities) and/or teachers to report violence (a GM). The question also looks at whether these reporting mechanisms explicitly include mention of, or provide information on, GBV. • Having a previously established mechanism to report SEA/SH indicates a willingness to monitor and hold alleged perpetrators accountable for SEA/SH. That said, If the mechanism is not being used, or there is limited information about it, then this should indicate more risk.

Risk screening tool question and risk level	Rationale for question
<p>8. Are there institutional CoCs or Behavioral Standards (or any form of protocol) for teachers and administrative staff (school/site/region-specific where project is being implemented or national) that include prohibitions against (a) sexual harassment; (b) sexual exploitation; and (c) sexual abuse?</p> <p>Criteria: <i>Lower risk is having Behavioral Standards or CoCs with explicit prohibition of SH and SEA</i> <i>Higher risk is having no Behavioral Standards or CoC</i></p>	<ul style="list-style-type: none"> • This indicator assesses whether written institutional Behavioral Standards are in place for organizations involved in the project before the project was proposed. These CoCs or Behavioral Standards set professional standards and consequence of non-compliance, to hold staff accountable for misconduct, including GBV. The document should cover SEA/SH as well as provide information about reporting mechanisms and investigative procedures. • CoCs or Behavioral Standards with these elements set standards of behavior that are meant to deter SEA/SH. Having a CoC or Behavioral Standards is a first step in mitigating SEA/SH and hence lowers the risk rating.
<p>9. Are there significantly more male teachers than female teachers in the schools relevant to the project?</p> <p>Criteria: <i>Lower risk is having a balanced ratio of teachers</i> <i>Higher risk is having significantly more male teachers than female teachers</i></p>	<ul style="list-style-type: none"> • This indicator assesses whether there is a highly skewed gender ratio among school staff, resulting in an unequal gender balance within the schools.
<p>10. Are there numerous reports of sex for grades, awards, promotions related to schools in the country of the operation?</p> <p>Criteria: <i>Lower risk is no apparent trend of sex for grades</i> <i>Higher risk is numerous instances of sex for grades, awards, promotions reported or known.</i></p>	<ul style="list-style-type: none"> • Often in school situations (for both children and teachers), students may experience pressure to receive good/passing grades, in order to move to the next grade and in order to meet family and peer expectations. This makes children more vulnerable to SEA/SH (through, for example, the practice of sex-for-grades). This is particularly of concern in those settings where there are high stakes examinations, which do not rely on performance over a longer time period, but lead students to be more invested in the outcome, in turn exposing them to SEA/SH risks by a teacher or test administrator who can manipulate these scores. • Additionally, if teacher advancement and promotion is based on an objective scale/regulated framework, this may reduce teachers' vulnerability to SEA/SH in order to be promoted or to have a salary increase.
<p>11. Are there measures in place to support teachers/school staff recruitment which is "student/child-safe" – that is in addition to taking into account an applicant's skills, the hiring process also ensures that they do not have legal or police records/well-founded allegations which would indicate that they have used SEA/SH for either peers or students?</p>	

Risk screening tool question and risk level	Rationale for question
<p>Criteria: Lower risk is having such measures which are used to recruit school staff Higher risk is having such measures and not using them for recruitment, or not having measures</p>	<ul style="list-style-type: none"> • A school/education system (for the level of education which the project is targeting) that takes an applicant's prior history with regards to SEA/SH into account during the application process and uses it to prevent those with past allegations/records of SEA/SH from working within the education system, signals an understanding that this is unacceptable and is less likely to be tolerated within the education system. • By having such measures in place, it also reduces the risk (to some extent) that individuals who are perpetrators of violence will be working within the education system, over time.
<p>12. Do schools in the project community have plans to refer teachers/ students affected by GBV to services?</p>	<ul style="list-style-type: none"> • In schools or project communities where the project will be implemented is their identification and access to care for students affected by GBV. This question aims to assess whether schools in the project area have resources and materials to support students affected by GBV. Referral pathways should be linked to educational settings and provide a clear pathway through which survivors of GBV can access appropriate care and support. • This indicator assesses the school's readiness to address GBV before the project being assessed is proposed. • Systems for identification and care of GBV survivors reflect awareness of GBV and willingness to address it.
<p>Criteria: Lower risk is having identification and access to care for teachers and/or students who report violence Higher risk is not having identification and access to care for teachers and/or students to report violence</p>	

Annex 3: Social Protection and Jobs Sector Context and Project Questions

1. **The SPJ sector is an important driver of human capital development, particularly among the poorest and most vulnerable.** SPJ programs empower individuals and households to reduce poverty, cope with crises and shocks, find jobs, improve productivity, invest in the health and education of their children, and protect the elderly. SPJ programs may be implemented through public and/or private actors, often with the involvement of multiple sectors. They range from social safety net programs to employment services and pensions (see Box A3.1).

Box A3.1: Types of Social Protection and Jobs Programs

- Contributory programs, deferred compensation, social pensions
- Contributory and non-contributory social insurance
- Non-contributory safety net programs, including cash transfers and public works
- Safety nets plus, graduation, economic inclusion
- Jobs skills training (technical and socio-emotional skills, financial literacy, counselling, and support)
- Stipends/waivers for education and health
- Entrepreneurship and self-employment, access to finance, and financial literacy
- Apprenticeships and internships, mentoring
- Demand-side employment creation or wage subsidies
- Labor-market counselling and intermediation services
- Services for the homeless and destitute, including street children, persons with disabilities, etc.
- Assistance to refugee and internally displaced populations

2. **Many SPJ programs transfer resources to women and girls or promote investments in their human and/or productive capital.** While some programs have explicit objectives of women’s empowerment, many support women and girls to achieve broader program objectives, such as poverty reduction, early childhood development, increased resilience, etc. They are implemented in all types of contexts, from densely populated urban neighborhoods to remote areas, from high-income contexts to humanitarian crisis situations.¹ Some programs transfer resources directly to women while others transfer resources to household heads or other household members. Irrespective of their stated objectives or recipients, there is strong evidence that SPJ programs have the potential to empower women, increase their agency and access to resources, as well as reduce many forms of GBV, such as IPV and some forms of violence against adolescent girls (such as early marriage).²
3. **SPJ programs can also be an entry point to address factors that underly GBV, such as low levels of education or lack of access to assets and resources for girls and women.** Guidance on addressing GBV issues more broadly in the SPJ sector is available in the [“Violence Against Women and Girls Resource Guide: Social Protection Brief.”](#)³ The Guidance Note, “Safety First: Social Safety Nets and Gender-Based

¹ Risks of SEA/SH and of GBV more generally are often heightened in situations of fragility, conflict and violence as social order has often broken down, public security and other basic services are weakened, and the presence of security forces and irregular militarized groups increases threats of sexual and other gender-based violence.

² See Buller et al (2018), Hagen-Zanker et al (2017); Peterman et al (2017); and Sholkamy (2011), among others, in Select Bibliography in Annex 3.

³ Gennari, Floriza, Diana Arango, Jennifer McCleary-Sills, Nidia Hidalgo. 2014. Violence Against Women and Girls : Social Protection Brief. World Bank, Washington, DC. <https://openknowledge.worldbank.org/handle/10986/21089>

Violence,” complements this Brief with detailed operational guidance to task teams on project design features that contribute to GBV prevention in beneficiary households and communities.⁴

4. **However, as with any development intervention, SPJ programs may also increase risks of GBV, both in the context of the program itself and in the broader context of beneficiaries’ homes and communities.** Examples are provided in Table A3.1 below. Some groups experience overlapping vulnerabilities, for example, girls and women in low castes or other social hierarchies, where sexual violence to punish transgressions is pervasive. Women with disabilities and elderly women are also often more vulnerable to all forms of violence, as are members of minority ethnic groups and the LGBTI+ community. These intersectional risks should be considered when evaluating risks and designing mitigation measures.

Table A3.1: Manifestations and Examples of SEA/SH in SPJ Projects

Type	Manifestations in SPJ projects	Examples
Sexual exploitation	In Bank-financed operations, sexual exploitation usually occurs when a project actor conditions access to a project benefit, service, or employment-related benefit on extraction of sexual gain	<ul style="list-style-type: none"> - A member of a selection committee requests a sexual favor in exchange for enrollment in the program - A payment operator refuses to pay a beneficiary unless she performs a sexual act - An employer demands sexual favors in exchange for an employment contract
Sexual abuse	In Bank-financed operations, sexual abuse occurs when a project actor uses force or unequal power relation vis-à-vis a beneficiary or community member to perpetrate or threaten to perpetrate an unwanted sexual act	<ul style="list-style-type: none"> - A social worker or community volunteer sexually assaults a beneficiary during a home visit - A public works supervisor sexually assaults a beneficiary - An enumerator sexually assaults a woman when collecting household data
Sexual harassment	In Bank-financed operations, sexual harassment occurs within the workplace and relates to employees/consultants experiencing unwelcome sexual advances or requests for sexual favors or acts of a sexual nature	<ul style="list-style-type: none"> - A project actor makes repeated advances or sends sexually explicit text messages to a co-worker - A colleague leaves an offensive picture that is sexually explicit on a co-worker’s desk - A supervisor asks female employees to greet him with a kiss on the cheek every day before work - A project actor pressures a co-worker to meet socially outside of work

⁴ Botea, Ioana Alexandra, Aline Coudouel, Alessandra Heinemann and Stephanie Anne Kuttner. 2021. “Safety First : How to Leverage Social Safety Nets to Prevent Gender Based Violence.” Washington, D.C.: World Bank Group. <https://documentsinternal.worldbank.org/search/33092524>

Applying the SEA/SH Risk Screening Tool to SPJ Projects

Table A3.2: SEA/SH Risk Scoring for SPJ Sector Projects

Risk Tier	Score out of 25
Low risk	0-8
Moderate risk	8.25-12.0
Substantial risk	12.25-16.0
High risk	16.25-25

5. **The second section of the Tool focuses on project context questions.** The task team should answer the project-specific questions when preparing an SPJ project. The task team discusses the questions with the client as needed. Table A3.3 below presents the questions and explains why each question is relevant when assessing the likelihood of exacerbating SEA/SH risks.

Table A3.3: SEA/SH Risk Screening Tool – Project-related Questions for Social Protection and Jobs Sector

No	Assessment question	Rationale and explanation	Scoring options
Project Implementation Areas			
1.	Are project activities implemented in areas of the country experiencing a humanitarian emergency?	Humanitarian emergencies may be man-made (internal or external conflict) or the result of natural or climate shocks (earthquakes, floods, etc.). They typically result in acute dependence on assistance and often in a significant influx of external actors (relief workers, security forces, etc.). During these humanitarian emergencies, vulnerability of women and girls to SEA/SH can increase due to their acute dependence on project actors for emergency assistance and the increased difficulties in monitoring project-related SEA/SH risks. During displacement, unaccompanied women and children or those living in camps might also be particularly vulnerable to SEA.	Low risk [0] is when no project activities are implemented in areas experiencing a humanitarian emergency High risk [2] is when any project activities are implemented in areas of the country experiencing a humanitarian emergency
2.	Are project activities implemented in areas where the implementing agency's capacity to monitor the project is limited?	This question refers to systems established by the Borrower, whether financed by the project or from other sources. The Borrower's monitoring capacity might be limited because of capacity constraints (at either national or local levels) and/or accessibility constraints due to insecurity or logistical challenges (difficult terrain, distance, etc.).	Low risk [0] is when the Borrower's monitoring capacity is sufficient High risk [1] is when activities are implemented in areas where the Borrower's monitoring capacity is limited
Project Preparation Process			
3.	As part of the project preparation, was there meaningful consultation with groups advocating for women, children, and adolescent girls?	Consultations with local women's groups, groups that advocate for children and adolescent rights, women's leaders, and other stakeholders can help to understand the local gender and GBV dynamics within which the project will be implemented. This in turn can help identify potential project-related SEA/SH risks. In contexts where the ability of women and girls to express their needs and concerns may be limited, effective consultation requires providing the opportunity for women to participate separately or in women-only groups. ^a The risk tool is expected to be filled out at both concept and appraisal stages. Risk is likely to be initially high (i.e., unless consultations were carried out early on during the identification process) and low once the SEP and ESA have been implemented.	Low risk [0] is when there were stakeholder consultations with groups advocating for women, children, and adolescent girls held separately from men High risk [1] is when there were no stakeholder consultations with groups advocating for women, children, and adolescent girls held separately from men

No	Assessment question	Rationale and explanation	Scoring options
		^a <i>Beyond Consultations: A Tool For Meaningfully Engaging with Women in Fragile and Conflict-Affected States</i> https://www.peacewomen.org/node/103491	
4.	During stakeholder consultations, did groups advocating for women, children and adolescent girls raise concerns about the project's potential additional SEA/SH risks?	While concerns about SEA/SH may not arise during stakeholder consultations for various reasons (because they are not a concern or, conversely, because SEA/SH is too taboo to discuss), the fact that such concerns are raised can indicate that the project may create additional SEA/SH risks. Moderators should be able to respond if issues of SEA/SH or GBV more generally arise, to maintain the privacy, dignity and ensure the well-being of all participants. (Under no circumstances should participants be asked directly to reveal their personal experiences of GBV or reveal the identities of others having experienced GBV).	Low risk [0] is when concerns related to project-related SEA/SH were not raised High risk [1] is when concerns related to project-related SEA/SH risks were raised <u>or</u> when there were no effective consultations with groups advocating for women, children and adolescent girls
Intervention Design			
5.	Do mechanisms for the selection of beneficiaries create opportunities for individual project actors to sexually exploit or abuse beneficiaries?	When project actors have influence over the selection of beneficiaries, they may abuse their position of power to extract sexual favors. Automated, randomized, or centralized beneficiary selection systems (such as those using social registries) to identify eligible households can significantly reduce these risks. In addition, selection mechanisms can include the presence of community members or authorities during the process, which would minimize the potential for SEA/SH. Projects where beneficiary selection is highly dependent on individual project actors represent a higher level of risk.	Low risk [0] is when individual project actors have limited or no decision- making power over beneficiary selection Medium risk [1] is when individual project actors have some degree of decision-making power over beneficiary selection, but the process takes place in public or in the presence of community members or local authorities High risk [2] is when individual project actors select beneficiaries with limited presence of external actors to validate the process
6.	Do mechanisms for the verification of conditionalities create opportunities for project actors to sexually exploit or abuse project beneficiaries?	During the process of verification of beneficiaries' compliance with various conditions (e.g., utilizing prenatal services, regularly attending school, registering with the national ID system), the project actors responsible for validating compliance could seek sexual favors. Transparent procedures can include automatic use of administrative data (e.g., school attendance systems) or technological solutions (e.g., thumbprint readers). In addition, community or public validation mechanisms can be introduced to limit opportunities for SEA/H. This can include the presence of community members, multiple service providers, or authorities during the process of validation of compliance. Where the validation of conditionalities is reliant on	Low risk [0] is when project actors have no decision-making power over verification of conditionalities or there is effective oversight Medium [1] is when the verification of conditionalities is conducted by individual project actors in public or in the presence of community members/local authorities High risk [2] is when the verification of conditionalities is conducted by individual project actors in private settings

No	Assessment question	Rationale and explanation	Scoring options
		assessments done by individual project actors with individual beneficiaries in private settings/without a community or public validation process, the risk is expected to be higher.	
7.	Do mechanisms for the transfer of benefits (cash, vouchers, in-kind goods, stipends, wages, and scholarships) create opportunities for project actors to sexually exploit or abuse project beneficiaries?	During the transfer of benefits, project actors may abuse their position of power to sexually abuse or exploit beneficiaries. When benefits are transferred automatically, the risk is considered low. Where project actors carry out transfers in the presence of other individuals at the time of in-person distribution, it is expected that the risk will be reduced. Such individuals include but are not limited to community members or local authorities. Transfer of benefits that occurs through individual interactions with project actors in private settings would pose a higher risk of SEA/SH.	Low risk [0] is when individual project actors have no direct control over transfer of benefits Medium risk [1] in when the transfer of benefits is conducted by individual project actors in public or in the presence of community members or local authorities High risk [2] is when project actors have direct control over transfer of benefits and transfers occur in private settings
8.	Do project activities include regular interaction with project actors (e.g., participation in public works, attending regular information or training sessions, counselling), which could create opportunities for project actors to sexually exploit or abuse beneficiaries (or for sexual exploitation or abuse between beneficiaries)?	In many SPJ programs, beneficiaries participate in group activities such as public works, training courses, social care activities, social mobilization or information meetings, etc. They may also be required to participate in one-on-one activities such as counselling, mentoring, on-the-job training, or employment. Beneficiaries may also be at risk of sexual abuse or harassment by other beneficiaries during group activities. Oversight of these activities may be ensured by the presence of other project actors, beneficiaries, community members, or non-project actors.	Low risk [0] is when there are no such activities High risk [1.5] is when there are such opportunities during regular interaction between beneficiaries and project actors Very high risk [2] is when there is a residential component to the activity (such as boarding schools)
9.	During program implementation, do female project actors work with male project actors alone or with limited oversight?	Female project actors (direct employees, service providers, or contractors) may be at risk of SH by male project actors, including managers and co-workers, particularly when working alone with them.	Low risk [0] is when female project actors do not work with male actors alone <u>or</u> there is oversight of the interactions High risk [1] is when female project actors work with male project actors alone with no or limited oversight
10.	Does the program involve engagement with military or paid security forces who come in direct contact with beneficiaries?	Some programs rely on police, peacekeepers, military personnel, or armed local militias for security. If in direct contact with beneficiaries, these forces may perpetrate SEA and may not be under the jurisdiction of the national legal system.	Low risk [0] is when there is no direct contact between military or paid security forces and beneficiaries or there is oversight High risk [1] is when there is direct contact between military or paid security forces and beneficiaries with limited or no oversight
Project Management			
11.	Does the implementing agency already have established Behavioral Standards or CoCs explicitly	Behavioral Standards or CoCs establish what constitutes unacceptable behavior of SEA/SH for all project actors, as well as the consequence of non-compliance. Their existence	Low risk [0] is when codes of conduct or Behavioral Standards explicitly prohibiting SEA/SH do exist

No	Assessment question	Rationale and explanation	Scoring options
	prohibiting SEA/SH that would apply to project actors?	may serve as a deterrent to SEA/SH by project actors. Behavioral Standards or CoCs include definitions of SEA/SH, project actors' responsibilities, reporting protocols, sanctions, etc.	High risk [1] is when CoCs or Behavioral Standards prohibiting SEA/SH do not exist
12.	Have these CoCs or Behavioral Standards explicitly prohibiting SEA/SH been communicated to project actors?	For CoC or Behavioral Standards to be an effective deterrent, they should be communicated to all project actors (including volunteers), clearly define SEA/SH, and lay out the consequences of non-compliance.	Low risk [0] is when CoCs or Behavioral Standards explicitly prohibiting [SEA/SH] have been communicated to project actors High risk [1] is when CoCs or Behavioral Standards explicitly prohibiting [SEA/SH] have not been communicated to project actors or where they do not exist

Additional Guidance for SPJ Projects:

- Care International. 2019. Cash & Voucher Assistance and Gender-based Violence Compendium: Practical Guidance for Humanitarian Practitioners – A companion to the GBV IASC guidelines. https://gbvguidelines.org/wp/wp-content/uploads/2019/07/CVA_GBV-guidelines_compendium.FINAL_.pdf
- International Rescue Committee. 2017. Cash Relief for Women and Girls. <https://www.rescue.org/uk/report/cash-relief-women-and-girls>
- Save the Children. 2012. Cash and Child Protection: How Cash Transfer Programming Can Protect Children from Abuse, Neglect, Exploitation and Violence. <https://resourcecentre.savethechildren.net/pdf/6805.pdf/>
- UNHCR (United Nations High Commissioner for Refugees). 2015. Guide for Protection in Cash-based Interventions. <https://www.unhcr.org/protection/operations/61e982c74/guide-protection-cash-based-interventions.html>. See also associated resources at: <https://www.unhcr.org/en-us/cash-based-interventions.html>
- WRC (Women’s Refugee Commission) and IRC (International Rescue Committee). 2018, updated 2022. Resources for Mainstreaming Gender-Based Violence (GBV) Considerations in Cash and Voucher Assistance (CVA) and Utilizing CVA in GBV Prevention and Response. <https://www.womensrefugeecommission.org/research-resources/mainstreaming-gender-based-violence-considerations-cash-voucher-assistance/>

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Annex 4: Health, Nutrition and Population Sector Context and Project Questions

1. **The HNP global practice provides financing, state-of-the-art analysis, and policy advice to help countries expand access to quality, affordable health care.** It prioritizes protecting people from falling into poverty or becoming poorer due to illness; and promoting investments in all sectors that form the foundation of healthy societies. By improving the health of the population in general, and women in particular, HNP projects support people to develop their human capital and become more active members of their communities. HNP projects can contribute to greater control by women and girls over their own reproductive and other health rights. At the same time, HNP programs can cause shifts in power dynamics between community members, where persons with influence and power over other members of the communities can misuse this influence and power during project implementation. These shifts may exacerbate the risk of SEA/SH in both public and private spaces by a range of perpetrators.
2. HNP **programs** include but are not limited to projects supporting health financing, service delivery, population and development, nutrition, and public health. HNP priorities include:
 - **Health:** Strengthen people-centered, integrated, and multidisciplinary primary health care services to ensure equitable access to, and quality of, care (including services targeting health promotion and disease prevention), and disease preparedness and response at the community level for universal coverage and financial protection.
 - **Nutrition:** Scale up high-impact interventions in high-need countries (including taxation of sugar-sweetened beverages and unhealthy foods); start to scale up cross-sectoral strategies to reduce both stunting and obesity/non-communicable diseases in low- and middle-income countries.
 - **Population:** Scale up evidence-based packages of interventions to address key population issues related to demographic transition, including support for reproductive health and related high-fertility issues, improving adult survival, managing the burden of non-communicable diseases, and managing and enhancing aging care.
3. **HNP programs dealing with maternal and child health or female genital mutilation (FGM) specifically target women and girls, but most aim at improving the health of the overall population.** HNP programs can be lifesaving for women who have experienced violence and empowering for women who, for example, gain control over their bodies by using family planning methods previously not available. There is strong evidence that HNP programs have the potential to empower women, increase their agency and access to resources, improve their health, as well as reduce forms of GBV, such as IPV and other forms of violence against girls, such as FGM. In addition, the health sector is the most used entry point into services for women who have experienced any form of violence and who are seeking help. Therefore, the health sector has a role in the path to recovery for all who have experienced violence.
4. **However, as with any development intervention, HNP programs may also increase risks of SEA/SH.** These risks can arise from beneficiary interactions with program actors and from their participation in program activities. Female project actors may also be exposed to SEA/SH risks in the performance of their responsibilities. Therefore, it is important to understand how these interactions may create conditions that trigger or exacerbate SEA/SH, for women and girls,¹ and to set in place mitigation measures that seek to prevent SEA/SH.

¹ Men and boys can also be exposed to risks of SEA/SH; it is important to consider particular circumstances in which men and boys are at risk of SEA/SH risks, particularly in relation to minors interacting with adults in positions of power. Mitigation measures proposed in this GPN may also protect boys from SEA.

Table A4.1: Definitions, Manifestations and Examples of SEA/SH in HNP Projects

Definition	Manifestations in HNP projects	Examples
<p>Sexual exploitation: Any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another</p>	<p>In Bank-financed operations, sexual exploitation occurs when a project actor conditions access to a project benefit, service, or employment-related benefit on extracting sexual favors</p>	<ul style="list-style-type: none"> - A member of an agency responsible for distributing nutrition supplements requests a sexual favor against the provision of nutrition packages. - A program actor denies access to health care (like a vaccination for Ebola) to a beneficiary unless s/he performs a sexual favor - A service provider demands sexual favors in order to provide birth control to a woman - A supervisor demands sexual favors in exchange for an employment contract or a promotion.
<p>Sexual abuse: Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions</p>	<p>In Bank-financed operations, sexual abuse occurs when a project actor uses force or unequal power relations vis-a-vis a beneficiary, community member, or colleague to perpetrate or threaten to perpetrate an unwanted sexual act</p>	<ul style="list-style-type: none"> - A medical professional sexually assaults a patient during a physical exam - A program actor assaults a co-worker during a field visit
<p>Sexual harassment: Any unwelcome sexual advance, request for sexual favors, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation to another, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile, or offensive work environment</p>	<p>In Bank-financed operations, sexual harassment occurs when a project actor makes unwelcome sexual advances or requests for sexual favor or acts of a sexual nature to other project actors</p>	<ul style="list-style-type: none"> - A project actor sends sexually explicit text messages to a co-worker - A colleague leaves an offensive picture that is sexually explicit on a co-worker's desk - A project actor asks all female employees to greet him with a kiss on the cheek every day before work - A male project actor touches a co-worker's breasts and suggests they meet up after work

Applying the SEA/SH Risk Screening Tool to HNP Projects

5. **Focus of the Tool and types of questions.** The Tool takes into consideration contextual risk factors at the country and community levels and project-specific risk factors. A composite SEA/SH risk rating is then calculated based on aggregation of risk ratings for the questions and corresponds to either a Low, Moderate, Substantial, or High risk rating (see Table A4.2).

Table A4.2: SEA/SH Risk Scoring for HNP Sector Projects

Risk Tier	Score out of 25
Lower risk	0- 10.25
Moderate risk	10.5-14.5
Substantial risk	14.75-17.5
High risk	17.75-25

The SEA/SH Risk Screening Tool: Project context questions/indicators

- The second section of the Tool focuses on project context questions.** The task team should answer the project-specific questions when preparing an HNP project. The task team discusses the questions with the client as needed. **Table A4.3** below presents the questions and explanations as to why each is relevant when assessing the likelihood of exacerbating SEA/SH risks.

Table A4.3: SEA/SH Risk Screening Tool – Project-related Questions for Health, Nutrition and Population Sector

Risk screening tool question	Rationale for question
<p>1. Is your project in an area of the country with a humanitarian crisis or emergency situation?</p> <hr/> <p>Criteria: <i>Lower risk is not working in a humanitarian crisis or emergency situation in project area</i> <i>Higher risk is working in a humanitarian crisis or emergency situation in project area</i></p>	<ul style="list-style-type: none"> • This indicator captures whether the implementation area is undergoing a humanitarian or emergency crisis such as a natural disaster, conflict, epidemic, or famine, according to the latest humanitarian updates documented and monitored by the UN Office for the Coordination of Humanitarian Affairs (OCHA), to account for the enhanced risk for GBV that humanitarian or emergency crises present. • In fragile or conflict-affected environments, communities may have undergone traumatic experiences, social norms may have shifted, the social fabric may have broken down, the rule of law may be difficult to enforce, and program supervision may be difficult. • Women and children are often unaccompanied during forced displacement thus increasing their vulnerability, and there is often limited security in camps for internally displaced persons and refugees. • Dependence on emergency assistance to meet basic needs increases risks of SEA in exchange for receiving aid.
<p>2. Is the project region or province in the lowest poverty quartile of the country?</p> <hr/> <p>Criteria: <i>Lower risk is not being in the bottom quartile of poverty</i> <i>Higher risk is being in the bottom quartile of poverty</i></p>	<ul style="list-style-type: none"> • Regions in the lowest poverty quartile of a country may be underserved and the most vulnerable to neglect. High poverty scores may mean residents of these areas are particularly vulnerable to many forms of exploitation, including sexual exploitation and may lack the resources and agency to avoid and report abuse. This indicator can be adapted to different measurements of poverty based on what data the Bank project is using to determine poverty levels in the PAD context analysis section.
<p>3. Is the project in hard-to-supervise areas? (for instance, very remote or geographically diffuse projects)</p> <hr/> <p>Criteria: <i>Lower risk is compact or easily accessed project areas</i> <i>Higher risk is hard-to-supervise areas</i></p>	<ul style="list-style-type: none"> • Projects that are spread across a wider area, and/or whose activities are in remote, very diffuse or hard-to-access areas, or are in areas to which PIU or Bank staff are unable to travel present greater challenges for supervision and therefore a higher risk of potential abuse and under-reporting of problems.
<p>4. During project preparation, consultation was undertaken with women’s groups, groups that advocate for children and adolescent rights, and other stakeholders. (Please note</p>	<ul style="list-style-type: none"> • It is important during project preparation to undertake substantive consultations with local women’s groups, groups that advocate for children and adolescent rights, women’s leaders, and other stakeholders in the project area, to identify women’s and men’s

Risk screening tool question	Rationale for question
<p>consultations should have provided a safe enabling environment for open conversation by women, recognizing that power dynamics in communities often limit women’s full participation.)</p> <p>Criteria: <i>Lower risk is having undertaken consultations with women’s groups in a safe environment to allow free participation and not having had concerns raised</i> <i>Higher risk is not having undertaken consultations with women’s groups in a safe environment to allow free participation, or having had concerns raised.</i></p>	<p>concerns in relation to the project, identify key project risks, and determine how to mitigate them.</p> <ul style="list-style-type: none"> • Consultations with local women, when properly facilitated, allow the task team to understand how safety, social tensions, and dynamics can be affected by a project, and to anticipate and mitigate SEA/SH risks. This is a particularly effective measure for understanding the context-specific patterns of GBV in the project-affected area. • Concerns about GBV may not always arise directly because this topic can be quite sensitive; GBV information should <u>not</u> be directly solicited by those who lack specific GBV data-collection training and experience. However, other indicators of gender inequality may provide valuable insights into a context with a high risk of GBV. These indicators may include: men exhibiting controlling behavior towards female relatives; women having little economic independence; women having restricted mobility; women not being able to work outside the home; sexual harassment and attacks on women in public places; societal acceptance of domestic violence as the norm; and other behaviors that emphasize the lower status of women. • Consultations with local women and men may also provide resources for alerting the Bank to abuses during a project and can provide insight into which GBV services are available in a community. Recommendations, concerns, and requests that arise in these consultations should be systematically documented and addressed to the extent possible. Consultations should provide a safe, enabling environment for open conversation by women, recognizing that power dynamics in communities often limit women’s full participation. • Consultations may also provide insight into which GBV services are available in a community.
<p>5. During the consultation and preparation (mentioned in the previous question), were issues related to GBV and/or GBV related concerns raised organically (meaning with no solicitation) during engagement with the community?</p> <p>Criteria: <i>Lower risk is No</i> <i>Higher risk is Yes</i></p>	<ul style="list-style-type: none"> • This indicator intends to recognize issues that might have been identified in the ESA, social risk assessments, and/or other studies, or in discussions and interviews with community or local organization representatives undertaken by the Borrower during the project design.

Risk screening tool question	Rationale for question
<p>6. Is the project rural, peri-urban, or urban?</p> <p>Criteria: <i>Lower risk is urban</i> <i>Medium risk is peri-urban</i> <i>Higher risk is rural</i></p>	<ul style="list-style-type: none"> Rural, peri-urban, and urban contexts all present unique challenges for addressing and preventing GBV. In urban settings, transactional sex and forced sex may be common, while rural settings may have higher risk of forced marriage or early marriage. None of these contexts are free from GBV, however, services may be harder to access in general and harder to access anonymously in rural areas. Because of the scarcity in services and social taboos governing access to services when available, rural areas are given higher risk ratings.
<p>7. Do end-users of health services know the true cost of health services and medicines?</p> <p>Criteria: <i>Lower risk is knowing the cost of healthcare and medicines</i> <i>Higher risk is not knowing the cost of healthcare and medicines</i></p>	<ul style="list-style-type: none"> This question may be incorporated into stakeholder consultations, with complementary information gathered from assessments at the national or subnational level, such as via DHS, on people’s knowledge of the cost of health services. In many contexts, patients may access services without knowing their true cost. For instance, a patient may be quoted a price for treatment upon being admitted to a hospital, but the final bill includes extremely high costs without clear justification. In addition, there are hidden costs, such as that of transport or medical drugs and commodities that the patient may have to bear out of pocket. This may put pressure on women to make up for the cost via sexual favors or other transactional sex.
<p>8. Does the health system include protocols on how to respond to survivors of GBV seeking care?</p> <p>Criteria: <i>Lower risk is protocols are in place</i> <i>Higher risk is protocols are not in place</i></p>	<ul style="list-style-type: none"> In the project area, the health system should have written protocols about the management of GBV as a health response. Protocols should include providing information on referral to other relevant services (legal, psychosocial, shelter, livelihood, and community services) available to the survivor. These protocols can either be national or site-specific. The World Bank’s ‘At a Glance’ document, Gender-Based Violence, Health and the role of the Health Sector, may provide helpful additional information on protocols.
<p>9. Are health service providers trained to manage GBV as a health response?</p> <p>Criteria: <i>Lower risk is health service providers are trained to manage GBV</i> <i>Higher risk is health service providers are not trained to manage GBV</i></p>	<ul style="list-style-type: none"> This question assesses whether trainings have been undertaken for health service providers on the health response to GBV, including testing, post-exposure treatment, and counseling on HIV/AIDS/sexually transmitted infections and pregnancy, including emergency contraception. The World Bank’s ‘At a Glance’ document, Gender-Based Violence, Health and the role of the Health Sector, may provide helpful additional information on referrals and other considerations.
<p>10. Are there a site-specific CoC or Behavioral Standards for health service providers that includes prohibitions against (a) sexual harassment; (b)</p>	<ul style="list-style-type: none"> Existence of Behavioral Standards or a CoC that explicitly sets out standards of behavior for staff and conveys that breaches will be investigated and penalized may serve as a

Risk screening tool question	Rationale for question
<p>sexual exploitation; and (c) sexual abuse?</p> <p>Criteria: <i>Lower risk is having a site-specific CoC or Behavioral Standards</i> <i>Medium risk is having a national CoC or Behavioral Standards</i> <i>Higher risk is having no CoC or Behavioral Standards</i></p>	<p>deterrent for abusive behavior. Behavioral Standards or CoC also ensure that all staff understand the expectations of behavior and have been informed of these standards.</p>
<p>11. Will the project be able to monitor implementation across the full span (both in terms of geographic spread and duration) of the work?</p> <p>Criteria: <i>Lower risk is Yes</i> <i>Higher risk is No</i></p>	<ul style="list-style-type: none"> This indicator seeks to determine whether a member of the PIU or Project staff who is knowledgeable about GBV, particularly SEA/SH, and how to identify related risks and its occurrence, will be mandated to periodically monitor project implementation, as well as obtain feedback from the affected community to assess whether the project activities are aggravating SEA/SH in its area of influence.
<p>12. Are female workers in close proximity to male workers with limited supervision?</p> <p>Criteria: <i>Lower risk is No</i> <i>Higher risk is Yes</i></p>	<ul style="list-style-type: none"> This indicator intends to account for project activities that will involve women working alongside men in offices or project sites, irrespective of their distribution (men/women), with insufficient supervision. Supervision can take the form of a person watching that relations among staff and workers are respectful and abide by a CoC that explicitly prohibits any kind of SH among the employees.

Annex 5: I am a task team leader. What steps should my project take to ensure SEA/SH risks are mitigated?

Guidance to Task Teams in Filling Risk Screening Tool and Incorporating Mitigation Measures	
Project Preparation	Step 1: TTL alerts SD Specialist of the need to fill SEA/SH Risk Screening Tool.
	Step 2: SD Specialist or a dedicated member of the task team accesses the SEA/SH Risk Screening Tool ((FURL: <i>SEAHscreen/</i>)) to begin a new screening for the project. The national-level questions of the Risk Screening Tool are populated automatically. The Bank’s Gender team maintains the data for these questions, which is updated every two years. The task team, working with their SD Specialist, fill out the project-specific questions of the SEA/SH Risk Screening Tool. The team may iteratively fill out the tool several times during project preparation, as more information is made available through the client or research. The task team discusses the questions with the client as needed. The TTL is responsible for ensuring the Tool is filled out with accurate and objective information. Budget implications should be explicitly discussed with the client during preparations if the task team assesses that these needs could be significant.
	Step 3: Once the initial risk rating is identified, the TTL will work with the SD Specialist to incorporate corresponding mitigation measures into the preparation or plans for implementation as needed. The timing for each of the mitigation measures is specified in the sector notes, and project expenditures should be discussed with the Borrower from an early stage. The task team’s SD Specialist is required to record the SEA/SH risk rating beginning at Concept stage, in the ESRS. A SEA/SH risk rating of TBD may be entered at this point if the SEA/SH risk rating is unknown, although this must be updated by Appraisal.
	Step 4: Towards the end of project preparation and ahead of the decision meeting, all answers to the project-specific questions need to be finalized. Based on the Tool and associated cut-off points for each sector, the SD Specialist advises the task team on the SEA/SH risk rating. The SD Specialist and TTL agree on the final SEA/SH risk rating. ¹ The SD Specialist includes the SEA/SH risk rating in the Appraisal ESRS.
	Step 5: The TTL, along with the SD Specialist, finalizes the mitigation measures to be included in the PAD. The SD Specialist reviews the Borrower’s ESF documents to ensure these measures are fully reflected.
Decision Meeting	Step 6: The task team ensures that the PAD included in the decision meeting package: (i) contains the agreed SEA/SH risk rating; (ii) highlights the main identified risks related to SEA/SH; and (iii) describes the proposed risk mitigation measures, if any. The SD Specialist ensures that the mitigation measures are included in the ESCP.

¹ In the case of disagreement about the project SEA/SH risk rating, the Chief Environmental and Social Standards Officer makes the final determination in consultation with the RSA, following the ADM for the overall Environmental and Social Risk Classification (see E&S Directive, Section III, B. 2. b).

Guidance to Task Teams in Filling Risk Screening Tool and Incorporating Mitigation Measures

Negotiation	Step 7: The TTL finalizes and agrees on the mitigation measures, resourcing for the measures, and their timing for delivery/implementation with the client. These measures are captured in the ESCP. The team has flexibility with certain measures, consistent with ESS1, paragraphs 16 and 17, as summarized in the ESCP.
By Effectiveness	Step 8: Select actions must be completed by the Borrower and the Bank task team and SD Specialist will reflect these in the required documentation.
During Implementation	Step 9: The task team supervises the Borrower’s implementation and monitoring of the agreed mitigation measures, in accordance with the timeframes set out in the ESCP and relevant E&S documents. The task team highlights progress in the ISRs. The SEA/SH risk rating for the project is also reviewed and may be updated throughout implementation. Any change is recorded in the ISR input form. If there are no changes in the rating then the previous rating will carry forward. All project-related allegations, if any, should be reported to Bank management, as advised in the ESIRT. The SD Specialist assists with the implementation (as relevant) and monitoring of the measures to be included in ISRs.

Annex 6: Collecting Information on SEA/SH

1. It is generally unnecessary to undertake new surveys to determine SEA/SH risks for a specific project, as key information is likely already available from country-level Demographic and Health Surveys or nationally representative standalone surveys on violence against women and girls. Eliminating various forms of violence faced by women and girls is also part of several of the Sustainable Development Goals and has led to an increase in data collection and reporting on GBV.¹
2. There should be **absolutely no data collection** related to SEA/SH from anyone who may be a survivor without making referral services available to support them. If data collection is necessary, task teams should confirm that protocols are in place to enable referral of participants disclosing experiences of violence **before data collection commences to avoid retraumatizing survivors**. Training of researchers must cover all safety and ethical guidelines related to GBV. **No focus group discussions with community members asking about personal experiences of GBV or SEA/SH should be undertaken**. Given that IPV and/or non-partner sexual assault affects 35 percent of women aged 15-49, focus groups are likely to have women who are survivors of an incident of GBV. For more information on how to discuss GBV ethically, see:
 - The Violence Against Women and Girls Resource Guide [Ethics page](#)
 - [World Health Organization and PATH \(Program for Appropriate Technology in Health\). 2005. Researching Violence Against Women: A Practical Guide for Researchers and Activists.](#)
 - [World Health Organization. 2001. Putting women first: Ethical and safety recommendations for research on domestic violence against women.](#)
 - [World Health Organization. 2007. WHO Ethical and safety recommendations for researching, documenting and monitoring sexual violence in emergencies.](#)
3. When data is unavailable, however, and data collection is undertaken on topics related to GBV, such as help-seeking behaviors, perceptions of quality of GBV service providers, or safety mapping of communities, the following guiding principles are to be followed and the ethical issues concerning GBV data collection are to be carefully considered. Only if these can be properly implemented should data be collected.
 - The benefits to respondents or communities of documenting GBV must be greater than the risks to them.
 - The safety and security of all those involved in information gathering about GBV is of paramount concern and should be continuously monitored.
 - Information gathering and documentation must be done in a manner that presents the least risk to respondents, is methodologically sound, and builds on current experience and good practice.²
 - Basic care and support for survivors must be available locally before commencing any activity that may involve individuals disclosing information about experiences of GBV.
 - The confidentiality of individuals who provide information about GBV must always be protected.
 - Anyone providing information about GBV must give consent before participating in the information gathering activity.

¹ For example, <http://dhsprogram.com/What-We-Do/Survey-Types/DHS.cfm>

² An example of this is the [Ethical and Safety Recommendations section](#). In particular, Ellsberg, Mary Carroll, and Lori Heise. 2005. *Researching Violence Against Women: A Practical Guide for Researchers and Activists*. Washington DC: World Health Organization, PATH.

- All members of the data collection team must be carefully selected and receive relevant and sufficient specialized training and ongoing support.
- Additional safeguards must be put into place if children (i.e., those under 18 years) are to be the subject of information gathering.³

Dos and Don'ts for data collection when conducting a social risk assessment to assess SEA/SH risks

4. Below are a set of lessons and recommendations taken from global guidance and internal learning intended to clarify safe and ethical practice, when assessing SEA/SH risks

Do:

- Do recognize that SEA occurs in a broader context of GBV, and that GBV can take many different forms depending on the project/country context.
- Do assume that different forms of GBV are present within the community even if available data is limited: GBV is largely underreported. As of 2013, 35 percent of women globally report having experienced either IPV or sexual assault by a non-partner (WHO 2013).
- Do draw on existing information and datasets about GBV patterns and prevalence (including DHS data, UN reports, NGO assessments, etc.) to assess the more specific extent of GBV in the project area/region/country.
- Do consult available guidance on GBV risk assessment and evidence-based programming available in:
 - The Violence Against Women and Girls Resource Guide
 - The Global GBV Taskforce Report: Working together to prevent Sexual Exploitation and Abuse – Recommendations for World Bank Investment Projects
 - Inter-agency Agency Standing Committee Guidelines on integrating GBV interventions in humanitarian action – reducing risk, promoting resilience and aiding recovery.
- Do assess the extent of existing efforts to prevent and respond to SEA/SH and GBV more broadly in the project area/country, by coordinating with internal colleagues, for instance in Education, Gender, and Social, Urban, Rural and Resilience, and by reaching out and consulting with key stakeholders outside the Bank, such as women's groups, NGOs, and multilaterals (UNFPA, UNICEF, WHO) who can help:
 - Identify women's and men's needs and concerns in relation to the project, and key project risks and how to mitigate them.
 - Compile a map of available services and assess quality of services.
 - Summarize how the project links (or can link) to existing services available to survivors of GBV.

³ See recommendation 8 in WHO. 2007. *WHO Ethical and safety recommendations for researching, documenting and monitoring sexual violence in emergencies*. Geneva: World Health Organization. Available at: <https://www.who.int/publications/i/item/9789241595681> See also: WHO and PATH. 2016. *Ethical and safety recommendations for intervention research on violence against women – Building on lessons from the WHO Publication: Putting women first: ethical and safety recommendations for research on domestic violence against women*. Geneva: World Health Organization. Available at: <https://apps.who.int/iris/bitstream/handle/10665/251759/9789241510189-eng.pdf>

- Describe what types of GBV are prevalent in the community, as well as help-seeking behaviors of survivors.

Do Not:

- Undertake research efforts to uncover prevalence or patterns of GBV or to set a baseline of GBV within the project community. The safest way to collect unpublished data is via key informant interviews with experienced actors already working on GBV prevention and response. Undertaking baseline surveys for the purpose of SEA/SH risk assessment should be avoided.
- Seek out survivors of GBV and question them about incidents.

Annex 7: Example of an SEA/SH Action Plan

This sample SEA/SH Action Plan is included for information purposes. It provides an example of one approach to preparing an Action Plan and is not a template. Borrowers will need to prepare an SEA/SH Action Plan that reflects the project activities, relevant SEA/SH risks, responsible parties, and appropriate mitigation measures.

Guidance in relation to an SEA/SH Action Plan is set out in **paragraph 53** of this GPN. For more guidance on preparing an SEA/SH Action Plan, and for additional examples, Bank staff should contact their Regional SSI GBV Focal Point (listed on the World Bank Intranet, [seahscreen/](#)).

Project Context: This sample Action Plan is based on one prepared in June 2019 for the Dam Rehabilitation and Improvement Project, Additional Spillway Hirakud Dam, Odisha (P089985) and updated in September 2019.

Action	Tasks	Timeline	Responsibility	Indicators
Internal Complaints Committee (ICC) set up with ToR and orientation	Nominate ICC members	September 30, 2019	Department of Water Resources, Government of Odisha (DOWR) with support from WB	Finalized ToR
	Finalize ToR and hold an orientation			# Members nominated Orientation session held
Sensitize workers on CoC explicitly prohibiting and have it signed	Develop CoC	September 30, 2019	TATA, DOWR	CoC
	Sensitize project-related staff and workers about CoC requirements			# of project-related staff and workers trained
	Have CoCs signed by all those with a physical presence at the project site.			# of CoCs signed
Set up a GRM that can respond to SEA/SH cases based on the existing framework	Develop a process flowchart to handle SEA/SH cases	November 2019	DOWR	GRM system with referral process flowchart
	Recruit/Train personnel to operate GRM			# of personnel trained on GRM operation
	Set up a GRM helpline where calls are handled in confidentiality			GRM Helpline number
	Inform and build linkages with police, SHGs and service providers especially with those in Sambalpur			# of service providers, SHGs, informed about project # of service providers linked with the GRM

	Inform community about GRM			# of community awareness activities on GRM # of community members informed about GRM # of SEA/SH cases addressed with details on how it was resolved
	Review that the GRM receives and processes complaints			
Sensitize communities and all personnel associated with project on SEA/SH risks	Organize sensitization activities in communities that are close to the construction site and that will be affected	October, 2019	DOWR	# of community members sensitized
	Organize sensitization sessions with different groups of project staff, workers			# of project related staff sensitized on SEA/SH
	Visibly display signs around the project site (if applicable) that signal to workers and the community that the project site is an area where GBV is prohibited.			# of sites where IEC material has been set up
Continue to map service providers to include organizations that work on SEA/SH and broader GBV prevention and response. Conduct an in depth assessment of service providers	Add to the preliminary list of service providers to include additional organizations, and informal grassroots organization to better meet project and survivor needs.	October, 2019	DOWR	Directory of organizations with contact information, hours of operation and any associated fees for receiving services
Report in the quarterly progress report and review during Implementing Support Missions.	Review action plan during ISMs and progress against indicators listed above. Provide quarterly report (See Annex 6 for format of quarterly report)	Ongoing	DOWR	Successful implementation of agreed SEA/SH Action Plan (Y/N) Quarterly report

Annex 8: Example of an Accountability and Response Framework

This sample Accountability and Response Framework is included for information purposes. It provides an example of one approach to an Accountability and Response Framework and is not a template. Borrowers will need to ensure that their Accountability and Response Framework is suitable to their project or organization, and is aligned with national laws and any mandatory reporting requirements.

Guidance on the Accountability and Response Framework is set out starting at **paragraph 54** of this GPN. For more guidance on preparing Accountability and Response Frameworks, and for additional examples, Bank staff should contact their Regional SSI GBV Focal Point (listed on the World Bank Intranet [seahscreen/](#)).

Project Context: This example Accountability and Response Framework is based on one included as part of a broader SEA/SH Action Plan prepared by Alliance Biodiversity-CIAT for the Accelerating Impacts of CGIAR Climate Research for Africa (AICCRA) Project (P173398) in February 2022. This example has been amended from the original to align with updates to terminology and guidance on process timelines.

4.5 Accountability and Response Framework

The AICCRA project hereby sets out this Accountability and Response Framework (ARF) to define the principles, practices, roles, and responsibility for mitigating and responding to GBV cases.

4.5.1 Guiding Principles

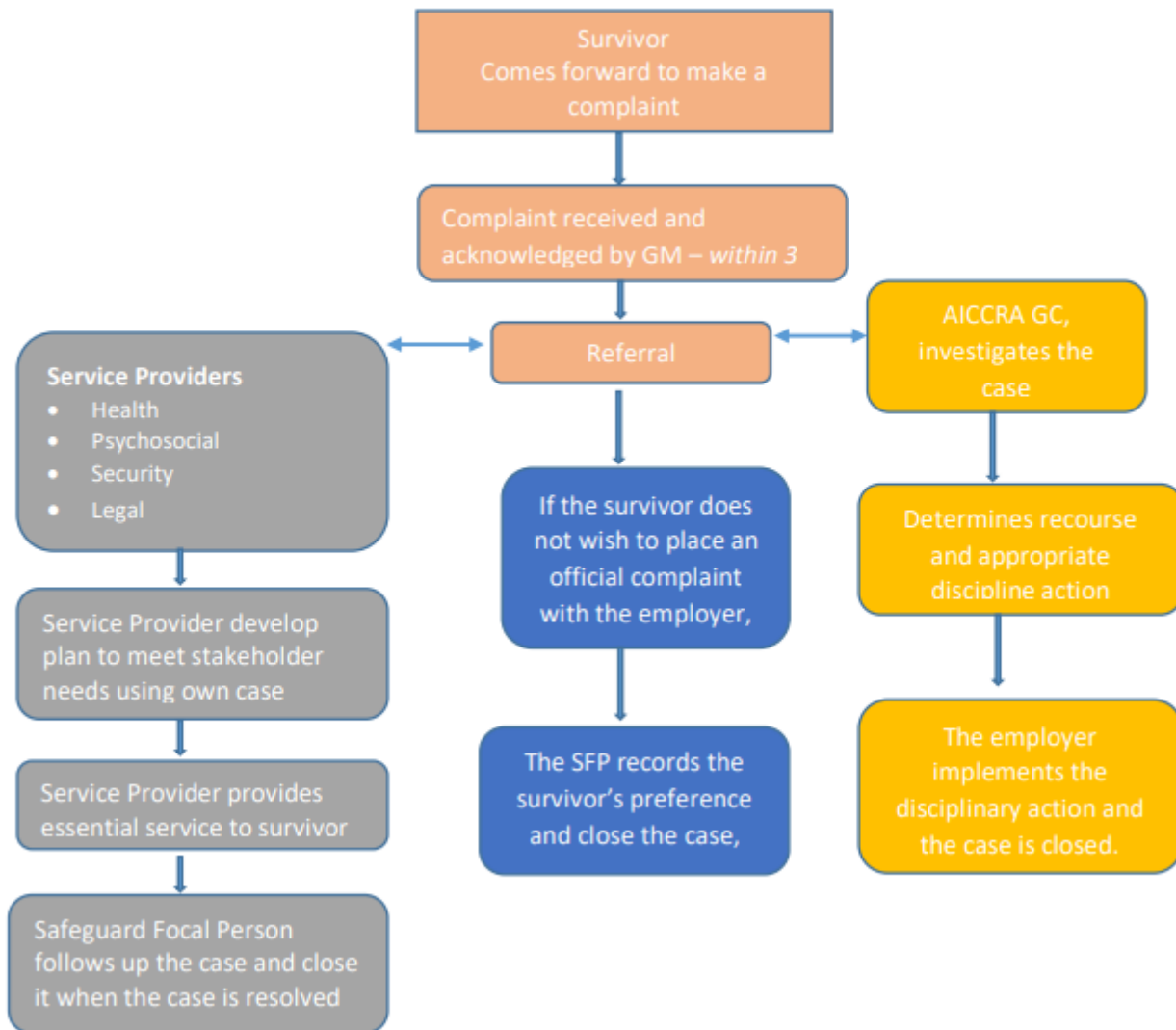
The AICCRA project recognizes and applies the following principles, that:

- All workers engaged under the project will be treated with respect regardless of their race, color, ethnicity, religion, political affiliation, disability, birth, or another status.
- Everyone, including children, has the right to live free from SEA/SH.
- All forms of SEA/SH are unacceptable whether it occurs at the work site or at the project locations.
- The safety of survivors of SEA/SH is of the utmost priority.
- Perpetrators will be held accountable for their actions, as SEA/SH constitute acts of serious misconduct and are therefore grounds for disciplinary measures, penalties and/or termination of employment and prosecution in accordance with national laws.
- Sexual activity with children under 18, including online harassment, is prohibited. Mistaken belief regarding the age of a child and consent from the child is not a defense.
- Use of inappropriate language or behavior towards women, children and men that may be deemed harassing, abusive, sexually provocative/explicit, demeaning or culturally inappropriate is disallowed.
- Exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior, is prohibited.
- Sexual interactions between staff of project partners at any level and community members of project locations that are not previously established under full consent are strongly discouraged. It is prohibited to withhold or promise actual provision of benefit (monetary or non-monetary) to community members in exchange for sex. Such sexual activity is considered “non-consensual” by the Project.
- The Project will provide avenues and mechanisms for reporting allegations of SEA/SH cases. There shall be no retribution, retaliation or victimization against persons who make reports against their employers or personnel of the Project.
- All Management personnel of the project have a responsibility to support and maintain an environment that is free of SEA/SH.

4.5.2 Grievance Mechanism for addressing SEA/SH Allegations and the Referral Pathway

As a requirement from the World Bank, the AICCRA project has designed and established a separate Grievance Mechanism (GM) for receiving and responding to all complaints relating to SEA/SH for each of the six project focal countries, notably Ethiopia, Kenya, Zambia, Mali, Ghana, and Senegal. The SEA/SH GM for each country is linked to GBV referral pathways and service providers. The figure below provides a simplified illustration of how the GM will operate. Full description of the procedure and service providers is provided in the respective country clusters stakeholder engagement plans.

Figure 1: Case Management Procedure for SEA/SH cases



4.5.3 A Survivor-Centered Approach

The AICCRA project is committed to pursuing a survivor-centered approach for responding to GBV cases through the SEA/SH GM established and will expect all partners to adopt or enhance this approach. In seeking a resolution of SEA/SH cases, the survivor's needs, wishes, and rights will be central to the processes. This will be done with the view to empower them and facilitate their healing and recovery. To this end, the project through its Grievance Mechanism and the GBV service providers will ensure that:

- The survivor will be treated with dignity and respect. Their needs, rights and choices will be prioritized through all processes and decisions. Assistance will not be imposed on a survivor if they are not ready to proceed with a matter. However, support will be given to survivors who choose to seek redress or those who change their mind about whether they wish to take action or not.
- The survivor's choice and the agency will be respected in all decisions. However, where the survivor is a minor (under 18 years of age) the project will follow the legal requirements for reporting abuse to the police or authorities in respective countries, irrespective of their consent or choice.
- The welfare principle of the Best Interest of the child will be upheld in all cases where minors are concerned.
- The safety and security of the survivor is of utmost consideration in all the processes. Every effort will be made to eliminate or minimize the risk of further traumatization or abuse to a survivor who reports a case.
- To address security, retaliation, and safety of survivors, the project and the GBV service providers will ensure confidential handling of all data and information relating to survivors, and confidentiality in all processes leading to support for survivors and the resolution of each case. Sharing the story of the survivor with another agency or person will only be done with the informed consent of the survivor.
- Survivors will be provided all the information needed for them to make informed decisions.
- Assumptions will not be made about the survivor's feelings, thoughts, and experiences. All persons who will handle cases and the processes leading to resolution will be trained on how to handle complaints with cultural and social sensitivity, non-judgementalism, confidentiality and tact.
- When a survivor comes forward to report a case of SEA/SH, the Safeguard Focal Person will record the survivors' account of the incident. This is expected to be conducted in a private setting and ensure that any specific vulnerabilities and safety concerns are taken into consideration.
- To maintain confidentiality and minimize stigmatization, below is the list of elements that will be recorded on complaint forms of SEA/SH survivors.
 - Age and sex of survivor;
 - Type/details of the alleged incident (as reported);
 - Location/place where the incident occurred;
 - Date and time when the incident occurred;
 - Whether the alleged perpetrator relates to the Project, as indicated by the survivor;
 - Whether the survivor was referred to a service provider;
 - The need of the survivor/ what that the survivor wants in regards to the incident that is being reported.
- Records of SEA/SH survivors will be stored separately from other general complaints and in a safe cabinet accessible only to the Safeguard Focal Person and the project lead.
- After registering the case, the Safeguard Focal Person will inform the AICCRA Cluster Lead and grievance committee within 24 hours of receipt and send an acknowledgment letter to the complainant or survivor within 3 working days of receipt.

4.5.4 Roles and Responsibilities

Based on the foregoing principles and procedure for mitigating responding to SEA/SH cases, the project has set different tiers of roles and responsibilities in accordance with the project structure. The table provides details.

Structure	Designated Staff	Role
Independent Steering Committee	All members	<ul style="list-style-type: none"> The project Independent Steering Committee (ISC) which has general oversight responsibility over the AICCRA project will receive and review biannual reports from the Project Management unit (PMU) about its activities and progress in mitigating and responding to SEA/SH cases. Based on this update, the ISC may provide feedback to the PMU on how to improve its operations response and make it more responsive to the needs of survivors.
Project Management Unit	Environmental and Social Safeguards Specialists	<ul style="list-style-type: none"> Oversee the overall implementation of mitigation and response measures to reduce SEA/SH risks on the project. Integrate E&S risk assessment and mitigation into risk assessment activities and risk mitigation instruments being prepared on the project Ensure inclusion of relevant SEA/SH clause in grantees contract. Oversee training of country level Safeguard Focal Persons and project workers on measures considered in this action plan. Liaise with Safeguard Focal Persons for resolution of GBV cases on the project. Conduct regular monitoring to establish compliance level to SEA/SH requirement and feedback to grant partners to improve performance. Prepare biannual report including data compiled on SEA/SH allegation and resolution progress to the World Bank.
AICCRA Country Clusters	Safeguard Focal Points	<ul style="list-style-type: none"> Log all complaints relating to SEA/SH and process case for referral, resolution and reporting to the World Bank. Ensure the implementation of SEA/SH mitigation measures on AICCRA Country Cluster activities. Facilitate training of project sub-grantees on SEA/SH requirements and procedures. Prepare biannual report including data compiled on SEA/SH allegation and resolution to the Program Management Unit
Grantees and Subgrantees	Project Leads	<ul style="list-style-type: none"> Implement SEA/SH mitigation measures prescribed by the project. Develop/adapt CoCs and policies and procedures on SEA/SH for employees to sign on.

		<ul style="list-style-type: none"> • Ensure that cases reported by survivors are brought to the attention of Safeguard Focal Person, lodged, and processed for referral and resolution. • Ensure readiness and commitment to address and apply sanction on SEA/SH cases committed by workers. • Cooperate with GBV service providers to offer support to survivors during handling of cases.
AICCRA Country Clusters	Cluster Grievance Committee	<ul style="list-style-type: none"> • Verify the allegation to determine whether (i) the allegation falls within the definition of SEA/SH; and (ii) the alleged perpetrator is an individual associated with the AICCRA project. • Incident Verification should take no longer than three months • Recommendation for sanction commensurate with offense and in compliance with local labor law should be made if incident is verified
Referral	GBV Service Providers	<ul style="list-style-type: none"> • Be used as referral agencies for survivors of SEA/SH cases • Required to use their respective GBV case management procedures. • Provide essential services required to support survivors. • Required to maintain confidentiality, safety, and security of survivors in accordance with best practices, in particular ensuring survivor centeredness through the processes and seeking the consent of the survivor when personal data must be shared. • Required to inform the Safeguard Focal person when a case is resolved so it is recorded in the grievance logbook.

4.5.5 Sanctions for SEA/SH violations

Sanctions in SEA/SH violations, once established may include:

- Additional training.
- Informal warning.
- Formal warning.
- Suspension.
- Loss of part or full salary for a period.
- Termination.
- Report to the police or other legal authorities with the consent of the survivor.
- Report to the police or legal authorities if the survivor is a minor and has been sexually abused.

4.5.6 National Laws and other Legal Considerations

The AICCRA project will ensure that grant partners comply with the respective laws and regulations of the six focal countries on SEA/SH. GBV cases such as rape, defilement and many others are mostly categorized as criminal acts, which cannot be settled out of court. The project will take steps through GBV service providers identified to report such incidents to law enforcement agencies and allow the survivor to decide how to proceed with such cases.